

# CHILTERN DISTRICT COUNCIL

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## Licensing & Regulation Committee

Thursday, 29th November, 2012 at 6.30 pm

Large & Small Committee Room, King George V House, King George V Road,  
Amersham

### A G E N D A

- 1 Evacuation Procedures
- 2 Minutes  
To sign the Minutes of the meetings held on 1 October and 18 October 2012.
- 3 Apologies for Absence
- 4 Declarations of Interest
- 5 Chiltern Hackney Carriage and Private Hire Policy Consultation Response  
(Pages 1 - 2)  
*Appendix 1 (Pages 3 - 6)*  
*Appendix 2 (Pages 7 - 24)*  
*Appendix 3 (Pages 25 - 30)*  
*Appendix 4 (Pages 31 - 46)*
- 6 Exclusion of the Public (if required)  
To resolve that under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following item(s) of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Act.

**Note:** All Reports will be updated orally at the meeting if appropriate and may be supplemented by additional reports at the Chairman's discretion.

**Membership: Licensing & Regulation Committee**

Councillors: P N Shepherd (Chairman)  
D G Meacock (Vice-Chairman)  
S P Berry  
N L Brown  
Mrs J A Burton  
M J Cunnane  
G K Harris  
P M Jones  
D J Lacey  
S A Patel  
M Prince  
C H Spruytenburg  
N Stewert  
H A Trevette  
M Vivis

**Date of next meeting – Thursday, 14 February 2013**

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**CHILTERN DISTRICT COUNCIL  
LICENSING AND REGULATION COMMITTEE – 29 NOVEMBER 2012**

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*Background Papers, if any, are specified at the end of the Report*

**HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICY.  
CONSIDERATION OF RESPONSES FOLLOWING CONSULTATION**

*Contact Officer: Ben Coakley 01494 732060*

**RECOMMENDATIONS:**

**That:**

- 1 The Licensing & Regulation Committee to consider the responses from the public consultation and comment in relation to each of the proposals at today's meeting.**
- 2 The policy is redrafted with greater clarity on the relevance of convictions and to refine or remove any ambiguous policy requirements. The policy would be considered at a future Licensing and Regulation Committee prior to agreement**
- 3 A subgroup be established by the Licensing and Regulation Committee to consider further the consultation responses and the proposals with a view to recommending further changes at a future Committee meeting. Following agreement any changes would be incorporated in to the Policy.**
- 4 Officers review the Fees charged by the Council for the various licences and consider issuing dual licences granted for more than one year.**

**Background:**

- 1 The 12 week consultation period for the revised policy concluded on the 30<sup>th</sup> September 2012.
- 2 Consultation included direct SMS messaging of all drivers and operators, a dedicated web page with a large banner directing people from the Chiltern homepage, newspaper coverage of the consultation, direct email to all Councillors, police, highways, neighbouring authorities and interested stakeholders e.g. residents groups. Reminder communications also went out to drivers prior to the official closing date.
- 3 Informal meetings with the trade were also arranged and held prior to the start of the consultation and also during the consultation to allow any clarifications or items to be considered.

## Item 5

- 4 In addition, a workshop (led by the Chairman of the Licensing & Regulation Committee) was held with the trade on the 20<sup>th</sup> September 2012 to consider in detail subsequent issues or concerns. The minutes are attached as **Appendix 1**.
- 5 The overall summary of the comments made in relation to the policy proposals and more general comments have been collated and provided as **Appendix 2**.
- 6 All of the original responses (as submitted to the Council) from the trade and other stakeholders are attached as **Appendix 3 and 4**.
- 7 Overall, this consultation has highlighted a number of interesting and pertinent issues and Officers have welcomed the useful two way discussion with the trade. Officers would also like to thank those trade members that have taken the time to meet to discuss the policy proposals in some detail.
- 8 The overall recommendation arising from comments from the trade and stakeholders suggests that further radical change to the policy is not required. The following changes may however be considered:
  - A redraft of the policy to clarify some ambiguity
  - Clarification of the relevance of convictions
  - Consider reintroducing dual drivers licences issued for more than one year to reduce the administration and costs of licensing
  - Reduce the cost (£) to applicants in complying with conditions
- 9 It is recommended that the policy is redrafted with greater clarity on the relevance of convictions and to remove any ambiguous policy requirements at the current time.
- 10 In drafting the policy consideration should be given to enabling the insertion of additional appendices so that additional requirements and controls may be added as they are agreed by the Licensing and Regulation Committee. One matter that could be considered following the introduction of the new policy would be the feasibility of increasing the number of wheelchair accessible vehicles.
- 11 A subgroup could be established by the Licensing and Regulation Committee to consider further the consultation responses and the proposals with a view to recommending further changes at a future Committee meeting. Following agreement any changes would be incorporated in to the policy appendices.
- 12 To review the Fees charged by the Council for the various licences and consider dual licences granted for more than one year.

**Background papers: None**

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**APPENDIX 1: WORKSHOP MINUTES****CHILTERN DISTRICT COUNCIL  
HACKNEY CARRIAGE & PRIVATE HIRE  
POLICY CONSULTATIVE WORKSHOP**

**Date:** 20 September 2012  
**Time:** 10:00 am  
**Venue:** Council Chamber

**SUMMARY OF POINTS OF DISCUSSION**

The new proposals set out in draft policy were discussed during the workshop and the comments put forward are summarised in the table below:

Proposed Policy	Comments
<p><b>PROPOSED POLICY 1:</b> All existing and new drivers will be required to attend a disability awareness training session to be held at the Council offices upon request.</p>	<p>There was general support for this policy to raise awareness and improve standards but there was concern over the cost of the training and it was noted that previous training had been available without cost to the trade.</p> <p>It was commented that the majority of drivers have already undertaken training through their operator or independently and it seemed excessive to require additional/duplicate training.</p> <p>It was suggested that the proposed policy should be amended to allow an exemption for drivers who could provide evidence of recent training (e.g. a certificate from the training provider for training undertaken in the previous 5 years detailing the content of the course) and details of the content of the course.</p>
<p><b>PROPOSED POLICY 2:</b> Where an existing licensed hackney carriage driver applies to obtain a private hire driver's licence or visa versa no additional medical will be required as part of the application process. The medical expiry date of any licence granted</p>	<p>There were no objections to this proposal put forward.</p>

will be the same as that of the existing licence held by the applicant.	
<b>PROPOSED POLICY 3:</b> A reduction of 25% on the vehicle licence fee for any vehicle which falls within Band A, B or C for road tax purposes.	There were no objections to this proposal put forward.
<b>ADDITION TO THE POLICY ON ADVERTISING:</b> In relation to advertising materials, any false, misleading or inaccurate material contrary to this policy and/ or its conditions will result in the taking of enforcement action.	It was clarified that the purpose of the amendment was to control false/misleading/illegal advertising material that included the Council's name.  It was suggested that the wording of the existing policy should be amended to 'recommend' that prior approval of any advertising is sought from the Council rather than requiring it.
<b>PROPOSED AMENDMENT 4:</b> Additional guidelines to assist in decision making and the strengthening the relevance of conditions.	It was noted that this amendment would only affect new applicants.  It was suggested that the starting point for the minimum 'conviction-free' period should be clearly defined because this is not clear from the proposed wording (e.g. 3 years from conviction <b>or</b> release from custody).
<b>PROPOSED REVISION TO THE REHABILITATION PERIODS FOR CONVICTIONS:</b> The existing policy suggests that at least 3 years free from offences for drunkenness with a motor vehicle, drugs and indecency should be extended to 5 years.	There were no objections to this proposal put forward.
<b>PROPOSED POLICY 5:</b> Introduction of a points based system for offences  <b>PROPOSED POLICY 5 cont...</b>	This proposed policy was strongly opposed and it was claimed that the majority of drivers were against its implementation. It was considered that as the existing system is effective, it is unnecessary to change it and the proposal would create a bad relationship between the trade and the Council.  It was commented that the proposed items in the scheme were unclear (e.g. who does the MOT need to be produced to and who needs to witness an item shown in the scheme?) and there was concern that malicious allegations could be made which could result in the accrual of points.  It was suggested that the scheme amounted to

	<p>double jeopardy, as the Police/Court would punish for offences and then the Council would also punish. However, it was explained that the Police/Court would deal with the DVLA Driving Licence and the Council would consider if the driver, for example, was a fit and proper person to hold a Licence to drive Hackney Carriages or Private Hire Vehicles.</p> <p>It was further explained that the proposal provided an open and transparent system for dealing with the cumulative effect of breaches of conditions/offences. The accumulation of points would lead to referral to a Licensing Sub-Committee for consideration of appropriate action. The Sub-Committee's discretion would not be fettered by the scheme and each case would continue to be determined on an individual basis.</p>
<p><b>PROPOSED POLICY 6:</b> Requirement for a 'police report' for new applicants that have lived in the UK for less than 5 years.</p>	<p>It was confirmed that this is only for new applicants.</p> <p>There were concerns over the effectiveness and the possibility of forged letters.</p>
<p><b>PROPOSED POLICY 7 &amp; 8:</b> Requirement that vehicles may be no older than 4 years at initial application and no older than 10 years on subsequent renewal, and that the 'standards of appearance' conditions should be an indicator as to the condition that the vehicle should be kept in throughout the duration of the Licence, and not a reason to licence an older vehicle.</p> <p><b>PROPOSED POLICY 7 &amp; 8 cont...</b></p>	<p>It was commented that the majority of the vehicles are maintained in a good condition yet the proposed policy would penalise all Licence holders.</p> <p>It was suggested that the compliance test should determine whether a vehicle is fit for purpose (including appearance) and not its age.</p> <p>There was concern that it would be costly to have to replace a vehicle at 10 years old and to replace any vehicle with a vehicle that is less than 4 years old.</p>
<p><b>PROPOSED POLICY 11:</b> Minimum size for taxi roof signs and removal of any alternative to the word "TAXI".</p>	<p>There was concern over larger signs being stolen at night and difficulty in removing the signs.</p> <p>It was suggested that there should be a minimum size, rather than a stipulated size.</p>
<p><b>PROPOSED POLICY 9:</b> Strengthening the checks involved to receive an executive plate</p>	<p>No comments were put forward as no representatives of the Private Hire trade were present.</p>

The following comments on the existing Policy were also put forward:

Extract of Policy	Comments
<p><b>Seat Belts:</b> When driving the vehicle the Licensee shall wear a seat belt at all times.</p>	<p>It was believed that this is unnecessarily excessive because it is over and above the statutory requirement for taxi drivers.</p>
<p><b>Requirement to carry/produce Byelaws:</b> The Licensee shall at times when driving the Vehicle carry with him or her a copy of the licence, byelaws and these requirements, and shall make it available for inspection by the Hirer, any other passenger, the Authorised Officer or a Police Officer upon request.</p>	<p>The necessity to carry byelaws in the vehicle was questioned.</p>

**Appendix 2 Summary of Responses**

Proposed Policy	Consultation Responses
<p><b>PROPOSED POLICY 1: All existing and new drivers will be required to attend a disability awareness training session to be held at the Council offices upon request.</b></p>	<p><b><i>Chiltern Taxi Drivers Association</i></b></p> <p><i>CTDA has no objections to this and would like to add that many drivers have already undertaken disability awareness training.</i></p> <p><b><i>Trade Workshop:</i></b></p> <p><i>There was general support for this policy to raise awareness and improve standards but there was concern over the cost of the training and it was noted that previous training had been available without cost to the trade.</i></p> <p><i>It was commented that the majority of drivers have already undertaken training through their operator or independently and it seemed excessive to require additional/duplicate training.</i></p> <p><i>It was suggested that the proposed policy should be amended to allow an exemption for drivers who could provide evidence of recent training (e.g. a certificate from the training provider for training undertaken in the previous 5 years detailing the content of the course) and details of the content of the course.</i></p>
<p><b>PROPOSED POLICY 2: Where an existing licensed hackney carriage driver applies to obtain a private hire driver's licence or visa versa no additional medical will be required as part of the application process. The medical expiry date of any licence granted will be the same as that of the existing licence held by the applicant.</b></p>	<p><b><i>Chiltern Taxi Drivers Association</i></b></p> <p><i>CTDA would welcome this change to the current requirements, since such medicals can cost in excess of £120 and puts an unnecessary financial strain on drivers. If there is an unexpired current medical at the time of application, then it seems logical not to have another medical.</i></p> <p><b><i>Trade Workshop:</i></b></p> <p><i>There were no objections to this proposal put forward.</i></p>

<p><b>PROPOSED POLICY 3: A reduction of 25% on the vehicle licence fee for any vehicle which falls within Band A, B or C for road tax purposes.</b></p>	<p><i>CTDA is supportive of any proposal aimed at reducing air pollution and therefore has no issues with this proposed policy.</i></p> <p><b>Trade Workshop:</b></p> <p><i>There were no objections to this proposal put forward.</i></p>
<p><b>ADDITION TO THE POLICY ON ADVERTISING:</b>          In relation to advertising materials, any false, misleading or inaccurate material contrary to this policy and/ or its conditions will result in the taking of enforcement action.</p>	<p><b>Chiltern Taxi Drivers Association</b></p> <p><i>CTDA would like further clarification on what 'statutory provision' includes.</i></p> <p><i>CTDA supports having door stickers on vehicles as long as they display the taxi company's name and contact number. This is important for customers as it allows them to identify the taxi that they have booked.</i></p> <p><b>Individual Response:</b>  <i>Our logo is clearly displayed on all of our vehicles and marketing and we believe it clearly distinguishes us from our competitors which make our cabs more recognisable for our customers. There are many vehicle operators in the area and as we are attempting to distinguish ourselves from our competitors so should they. So therefore we sincerely hope that you will raise this issue in your next Taxi and Private Hire Policy Consultation as the trademark of our logo and colours are important for us and our customer base. We believe that local firms, in competition with us, would be more than happy to abide by any ruling which would make us clearly distinguishable from them.</i></p> <p><b>Chesham Town Council:</b>  <i>In respect of Advertising, the Council believes there should not be a requirement restricting taxi company names on any signage since this will only make it harder for passengers to recognise taxis they have ordered.</i></p>

	<p><b>Trade Workshop:</b></p> <p><i>It was clarified that the purpose of the amendment was to control false/misleading/illegal advertising material that included the Council's name.</i></p> <p><i>It was suggested that the wording of the existing policy should be amended to 'recommend' that prior approval of any advertising is sought from the Council rather than requiring it.</i></p>
<p><b>PROPOSED AMENDMENT 4:</b>  <b>Additional guidelines in relation to the relevance of past convictions to assist in decision making and the strengthening the relevance of conditions.</b></p>	<p><b>Chiltern Taxi Drivers Association</b></p> <p><i>CTDA is keen to support initiatives that remove dangerous drivers from the roads so has no concerns on this amendment. However CTDA would like to stress the fact that each case should be considered on an individual basis rather than a blanket approach being adopted whilst making decisions.</i></p> <p><b>Trade Workshop:</b></p> <p><i>It was noted that this amendment would only affect new applicants.</i></p> <p><i>It was suggested that the starting point for the minimum 'conviction-free' period should be clearly defined because this is not clear from the proposed wording (e.g. 3 years from conviction <u>or</u> release from custody).</i></p> <p><b>CDC Legal Section:</b></p> <p><i>We would like to consider this section in more detail to ensure it is clear and easy to understand.</i></p>
<p><b>PROPOSED REVISION TO THE REHABILITATION PERIODS FOR CONVICTIONS:</b> The existing policy suggests that at least 3 years free from offences, should be extended to 5 years.</p>	<p><b>Trade Workshop:</b></p> <p><i>There were no objections to this proposal put forward.</i></p>

<p><b>PROPOSED POLICY 5:</b> Introduction of a points based system for offences</p>	<p><b><i>Chiltern Taxi Drivers Association</i></b></p> <p><i>CTDA has serious reservations on this proposal as overall it seems unfair and a bit extreme. It is our view that taxi drivers would, in effect, be punished twice for minor offences, once through the courts and then again by Chiltern District Council affecting their livelihood. We believe the points system is excessively punitive and just duplicates work and is not required as there are already other safeguards in place. In addition to this the point system is bureaucratic and will be more time consuming than the current system.</i></p>
<p><b>PROPOSED POLICY 5 cont...</b></p>	<p><i>The current system at CDC is working well and CTDA feel that these changes are only being suggested so that 'something different' and new is being implemented rather than changes being suggested that are in fact productive and required.</i></p> <p><i>While noting the Bracknell system was only an example, we feel it appropriate to comment on this scoring system in detail in light of its potential implications for all drivers.</i></p> <p><i>Unlicensed vehicle 12 points – no objections as we deem this a serious offence punishable by law</i></p> <p><i>Driving with no valid insurance 12 points - no objections as we deem this a serious offence punishable by law</i></p> <p><i>Failure to wear or display driver badge 6 points– we consider the points too high on this trivial offence particularly with the licence clearly displayed on the vehicle. Another point to raise is that it would be useful if the badges were smaller (similar size to your CDC work badges) so that they could be worn around the neck.</i></p> <p><i>Failure to notify conviction, caution or fixed penalty notice 6 points – points too</i></p>

	<p><i>high. CTDA feels that the current process of notifying CDC of any convictions, cautions, or fixed penalties is sufficient and working well and therefore feel that a point system is not required. CTDA would like to ask if currently the local police authority notify CDC of convictions, cautions or fixed penalties.</i></p> <p><i>Hackney carriage left unattended on rank 4 points – There should be no points for this. It is inevitable that drivers will need to leave vehicle for a short amount of time if only to get fresh air and be save to drive. It is common knowledge that in terms of health and safety individuals are recommended to take short comfort breaks from work, in the case of drivers these tend to be for a few minutes at a time, and are important for their wellbeing and to ensure that they are alert whilst driving. Further down you have mentioned that you are proposing the issue of 6 points for smoking in vehicles. We appreciate that not smoking in the vehicles is to create a clean and pollution free atmosphere in the vehicles, nonetheless smokers feel that they need to smoke. So if they are not allowed to smoke in their vehicles then surely they should be allowed to leave their vehicles for this purpose. The issues raised under this proposed point system appear contradictory.</i></p> <p><i>Private hire parked on a rank 6 points – no objections to this, as private hires are would be acting illegally by parking at ranks.</i></p> <p><i>Failure to notify an accident 4 points – greater clarity is required. How serious is ‘an accident’ to be reported?’</i></p> <p><i>Behaving in a disorderly manner 4-12 points – again a definition is required of what is considered to be disorderly. CTDA support the fact that disorderly behaviour should be addressed appropriately. However, CTDA is also</i></p>
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	<p><i>disappointed there is no mention of protection and support for drivers who suffer from public disorderly conduct. As Licensors of Chiltern District area drivers, we feel that CDC should show some obligation to provide support and protection towards its drivers. Details of several cases can be provided, where drivers have been verbally/physically abused and their vehicles damaged yet no support was provided by CDC to them. This treatment seems unfair as it implies that CDC only looks to punish disorderly behaviour if carried out by drivers and not vice versa.</i></p> <p><i>Failure to comply with traffic sign or signal 4 points – punishable with points on the licence so we see no need for further punishment from CDC</i></p> <p><i>Illegal tyres (per tyre) 3 points – points seem too high</i></p> <p><i>C &amp; U regulations 2-4 points - CTDA do not know what this is</i></p> <p><i>Smoking in Vehicle 6 points - no objections, however please see point raised about drivers leaving vehicles unattended for a few minutes.</i></p> <p><i>No Smoke free signage 6 points - no objections</i></p> <p><i>Unlicensed driver 12 points - no objections, this is a serious offence</i></p> <p><i>Driving with no valid MOT /inspection 12 points - no objections, this is a serious offence</i></p> <p><i>Failure to display plates or stickers 6 points - no objections</i></p> <p><i>Failure to provide MOT, inspection or insurance documents 4 points –this seems to high. Please could you clarify what is meant by ‘failure’ to provide. Drivers do not completely fail to provide</i></p>
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	<p><i>documents as their licenses would be revoked by this. However they do at times provide their documents late, for which they are charged £25.00, therefore at present there is already a fine and system in place to deal with the late provision of documents.</i></p> <p><i>Contravention of Stop Notice/suspension 12 points –Please could further explanation of this be provided.</i></p> <p><i>Private Hire plying for trade 12 points – strongly agreed as their insurance is invalid if they do this.</i></p> <p><i>Failure to notify change of details 4 points - more clarification needed. How much/little information is required? At present drivers immediately notify CDC of changes such as changes to vehicles.</i></p> <p><i>Vehicle in unclean condition 4 points – this seems harsh. Drivers clean regularly but after continuously being driven with passengers in them they can get a little untidy. However the drivers do clean their vehicles regularly.</i></p> <p><i>Use of hand held phone while driving 6 points - no objections if a statutory organisation such as the police have evidence of this. However it is difficult to prove an issue if there is no evidence and it is purely based on a complaint by for example a customer.</i></p> <p><i>Overcharging 6 points – CTDA have serious reservations about this. Prices of journeys are either calculated through meters or are a fixed price determined prior to the journey commencing. Often journeys cost more if traffic is heavier. Customers then may feel over-charged even when they are not. Where does the burden of proof lie?</i></p> <p><i>Too many passengers 8 points – no objections as this is not safe. However we would like to highlight that customers</i></p>
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*often ask for journeys where there are too many of them and they are told that we are not able to transport more than a certain number per licensed vehicle.*

*Horn misuse 4 points – again contentious. Who determines this? Often drivers need to use horn to get vehicles moving who are blocking their exit. An example of this is at Amersham Station, where other drivers often block in taxis with passengers. This frustrates our passengers and they consequently ask the drivers to use their horns to encourage the other cars to give way. Does this constitute misuse?*

*Illegal use of bus lane 4 points – no objection to the principle*

**Chesham Town Council:**

*While the Council does not necessarily agree with all the detailed submissions made by the Chiltern Taxi Drivers' Association in respect to the adoption of a points based system (e.g. display of drivers' badges), we do question whether a points system is required at all as we are not convinced that the current system is not working. If, as appears, the current system is operating satisfactorily, then we do not see the necessity of introducing an overly bureaucratic new system. Any new system would need detailed consultation with the taxi drivers.*

**Response letter from 66 drivers**

*Some of the points on the policy are acceptable but having a point system which can end up in us drivers losing our livelihood is unacceptable. There might be other options and other alternatives that could be discussed in a follow up meeting. Hopefully we can come to a mutual arrangement that will satisfy us all.*

**Individual Response:**

*I disagree with the points system that has been proposed, some of the contraventions listed are ridiculous, why would a driver with out a license care if they get any points?? Also how would a driver without vehicle insurance or MOT get a taxi license in the first place and if they were driving without a license they would not be affected by any points. Most of the contraventions already lead to points on your drivers licence or a fine, e.g: using a hand held phone while driving, illegal tyres, no MOT/insurance, too many passengers, illegal use of bus lane etc.*

*In my opinion the whole point system is a big waste of time.*

***Trade Workshop:***

*This proposed policy was strongly opposed and it was claimed that the majority of drivers were against its implementation. It was considered that as the existing system is effective, it is unnecessary to change it and the proposal would create a bad relationship between the trade and the Council.*

*It was commented that the proposed items in the scheme were unclear (e.g. who does the MOT need to be produced to and who needs to witness an item shown in the scheme?) and there was concern that malicious allegations could be made which could result in the accrual of points.*

*It was suggested that the scheme amounted to double jeopardy, as the Police/Court would punish for offences and then the Council would also punish. However, it was explained that the Police/Court would deal with the DVLA Driving Licence and the Council would consider if the driver, for example, was a fit and proper person to hold a Licence to drive Hackney Carriages or Private Hire*

	<p><i>Vehicles.</i></p> <p><i>It was further explained that the proposal provided an open and transparent system for dealing with the cumulative effect of breaches of conditions/offences. The accumulation of points would lead to referral to a Licensing Sub-Committee for consideration of appropriate action. The Sub-Committee's discretion would not be fettered by the scheme and each case would continue to be determined on an individual basis.</i></p>
<p><b>PROPOSED POLICY 6: Requirement for a 'police report' for new applicants that have lived in the UK for less than 5 years.</b></p>	<p><b><i>Chiltern Taxi Drivers Association</i></b></p> <p><i>CTDA has no objections to this.</i></p> <p><b><i>Individual Comment:</i></b></p> <p><i>My objections to the suggestion are:</i></p> <ol style="list-style-type: none"> <li><i>1) These reports will be an additional expense to drivers making applications to CDC</i></li> <li><i>2) Processing these reports will be an additional cost to CDC</i></li> <li><i>3) I would expect the time involved in obtaining reports from countries outside Northern Europe would add significant delay to the application process</i></li> <li><i>4) Would we really place uncritical reliance on every police report received? Isn't it likely that some countries police authorities would be less reliable than others in making objective reports?</i></li> <li><i>4) If the Home Office has satisfied itself that an immigrant is fit to live and work in this country, why would we as a local authority effectively place no confidence in immigration checks by asking for a foreign police report? If an immigrant is making the effort to work to support himself and his family rather than being a drain on the benefit system shouldn't that be taken as good evidence that he does not have a criminal past overseas or that if he does he is attempting to change his life for the better by coming to this country and looking for work?</i></li> </ol>

	<p><b>Trade Workshop:</b></p> <p><i>It was confirmed that this is only for new applicants. There were concerns over the effectiveness and the possibility of forged letters.</i></p>
<p><b>PROPOSED POLICY 7 &amp; 8:</b>  <b>Requirement that vehicles may be no older than 4 years at initial application and no older than 10 years on subsequent renewal, and that the ‘standards of appearance’ conditions should be an indicator as to the condition that the vehicle should be kept in throughout the duration of the Licence, and not a reason to licence an older vehicle.</b></p>	<p><b>Chiltern Taxi Drivers Association</b></p> <p><i>CTDA has very strong objections in respect of this. Chiltern District Council’s own recent study has shown that licensed taxi drivers are traditionally low earners, yet, even in the times of economic downturn, drivers are expected to buy new cars even though existing ones are clearly roadworthy and indeed go through more rigorous tests than normal vehicles. This rule would undoubtedly result in many drivers and firms going out of business. Surely market forces will determine whether customers wish to use vehicles over five years old so long as they are roadworthy.</i></p> <p><i>Please see attached document to support this issue.</i></p> <p><i>CTDA would also like to add that overall, the fleet of taxis in the Chiltern District compared to other local areas are of a better standard.</i></p> <p><b>Chesham Town Council:</b> <i>In light of the current economic climate, the Council believes that a rigorous enforcement of the policy that proposes the introduction of a minimum age criterion for vehicles (proposed policy 7) would be unfair and have a negative effect on the livelihood on many local taxi drivers. As an aspiration, the Council believes that, if such a policy is introduced, there should be a moratorium until there is a definite and sustained upturn in the economy.</i></p> <p><b>Individual Comment:</b></p> <p><i>i would like to request you to review the decision made on the age of vehicles</i></p>

*.this is not acceptable because the price of 4 years old car is around £12000 to £15000 .no one can afford the price .if this limit is 8 years then its affordable for every one and the people got executive cars for their journeys. At the moment Chiltern district council got more executive cars in bucks county council. your this decision may increased the level of unemployment. that is my point. I don't know how you think. i hope you will review your new policy*

**Individual Comment:**

*i am writing regarding your new policy proposal. My view towards some of the statements are negativity especially towards the car age which proposed that one can only use a car which is under 4-9 years old. i personally think it will make things more difficult and as well as that purchasing a car under 4 years old is quite expensive and not everyone is financially stable. my car is under 10 years old and it has passed the MOT and compliance. i do not see any point for a policy as such as the taxi cars go under compliance every six months. everyone was favourable for the previous policy and we should continue on that policy. i hope you understand what point i am making.*

**Trade Workshop:**

*It was commented that the majority of the vehicles are maintained in a good condition yet the proposed policy would penalise all Licence holders.*

*It was suggested that the compliance test should determine whether a vehicle is fit for purpose (including appearance) and not its age.*

*There was concern that it would be costly to have to replace a vehicle at 10 years old and to replace any vehicle with a vehicle that is less than 4 years old.*

	<p><b>Collection of 66 drivers:</b></p> <p><i>There are many drivers who will not be able to afford a car according to the new policy. Especially the part time drivers. There are many of us drivers who are in receipt of benefits due to low income, so for the proposal of having to get a new vehicle will only lower our income due to having to pay finance with interest on a new vehicle, that is if we do get finance. Also due to inflation of day to day expenses, we as taxi drivers would not be able to afford to live and also it</i></p> <p><b>Individual Response:</b></p> <p><i>I think having a vehicle no more than 4 years old on first license application is too low. With this policy you will put a lot of taxi drivers out of work because they will simply not be able to buy/afford newer vehicles. Do you really want people to be out of work and claiming benefits in the current economic climate? Please reconsider and cancel this policy or at least delay it for a few years.</i></p>
<p><b>PROPOSED POLICY 9: Strengthening the checks involved to receive an executive plate</b></p>	<p><b>Chiltern Taxi Drivers Association</b></p> <p><i>There are no objections to this. However CTDA would like to point out that It was CDC itself that relaxed the requirements of issuing executive plates, and subsequently CTDA feel that CDC are responsible for the abuse of the executive plates by doing so.</i></p> <p><b>Chesham Town Council</b></p> <p><i>Regarding proposed policy 9, (in a similar vein), the Council believes that the conversion of existing vehicles to ensure that they have clear, non-tinted windows would have a significant financially damaging impact on drivers. The Council suggests that such proposals are only applied to newly registered vehicles</i></p>

	<p><i>thereby phasing in the licensing requirements as and when vehicles are replaced.</i></p> <p><b>Trade Workshop:</b></p> <p><i>No comments were put forward as no representatives of the Private Hire trade were present.</i></p>
<b>PROPOSAL POLICY 10: Removal of existing requirement to notify the Council</b>	<p><b>Chiltern Taxi Drivers Association</b> <i>Please could you clarify this?</i></p> <p><b>Workshop:</b></p> <p><i>No comments</i></p>
<b>PROPOSED POLICY 11: Minimum size for taxi roof signs and removal of any alternative to the word "TAXI".</b>	<p><b>Chiltern Taxi Drivers Association</b></p> <p><i>Again we believe this to be an unnecessary extra cost to drivers (around £70 plus) when most such vehicles are clearly recognisable as taxis.</i></p> <p><b>Chesham Town Council</b></p> <p><i>Regarding proposed policy 11, the same argument applies as above. No immediate enforcement for the size on existing registered taxis, but this should apply to all new vehicles</i></p> <p><b>Trade Workshop:</b></p> <p><i>There was concern over larger signs being stolen at night and difficulty in removing the signs.</i></p> <p><i>It was suggested that there should be a minimum size, rather than a stipulated size.</i></p>
<b>PROPOSED POLICY 12: proposed for new non-standard private hire vehicle category to cater for limousines and novelty vehicles.</b>	<i>No specific comments</i>

**General Responses on the Policy Proposals**

**Chiltern Taxi Drivers Association**

*We welcomed the opportunity to comment on these proposals but would say, in conclusion, that the majority of them appear to be putting a greater burden on taxi drivers, particularly financially, in a very difficult economic period and do fear that, if implemented, it may put many more people out of work as well as offering less choice to the general public.*

**Chesham Town Council:**

*The Council broadly supports the comments submitted by the Chiltern Taxi Drivers' Association in its response to the consultation other than where specified. Specifically the Council would like to make the following observations (incorporated below)*

**Chalfont St Giles Revitalisation Committee:**

*We have no objections to the amendments/ alterations in the document.*

**Individual Response:**

*It appears that your consultation is null and void due to the Law commissions intervention, they are about to introduce new rules for taxis and PH cars. Even if they had not intervened, the consultation is a waste of time, as the former equity bill stated that saloon and other vehicles must be licensed as taxis so that all disabled have access to a cab. In areas where all taxis are wheelchair accessible, 98% of drivers have never had to carry a wheelchair passenger, as most wheel chair passengers prefer a saloon or MPV if they can transfer, and taxi owners have been forced to pay out huge sums of money to buy a wheel chair accessible vehicles when they wont be used for wheel chairs, and customers will start using the PH cars instead, as most people do not like the wheel chair cabs.*

*Most large towns and city's have dedicated wheelchair company's so why not just ask your local dial a ride company to put on a few more vehicles and leave the taxis alone.*

**Individual Response:**

*I have read through the proposed policy document and feel all proposed policy changes should not take place and am against all of the changes proposed. You have neglected to take in consideration of drivers proposed changes and are dictating the council changes. I am sorry but i am totally against your proposals.*

**Individual Response:**

*Don't agree with these new proposals that you have brought across.*

*<http://www.chiltern.gov.uk/taxipolicy>*

**Individual Response:**

*Please can you not make any changes to the existing Taxi licensing policy - ALL IS FINE HOW IT IS!!!!, No change to the existing policy document all proposals are bias.*

--

**General comments**

**Chiltern Taxi Drivers Association**

- *Drivers have put forward an objection to the requirement to have clear windows. Many such licensed vehicles have tinted windows in London and therefore fail to see why Chiltern drivers should be penalised for having tinted windows. In London, Addison Lee is the largest operating taxi vehicle fleet and their vehicles have tinted windows. It is estimated it would take approximately £600 to alter such windows on the many existing vehicles with this accessory.*
- *CTDA would like to put forward a proposal that taxi badges are renewed every 2-3 years like in neighbouring areas such as High Wycombe. This would be preferably to drivers and would also save time for CDC staff and be less bureaucratic than the current system of the badges being renewed annually.*
- *CTDA would like the opportunity to further discuss other issues such as taxi roof lights, door panels, and new private hire vehicles with CDC.*

**Chesham Town Council**

*Finally, while not part of the consultation per se, the Council would like to express its support for the Chiltern Taxi Drivers' Association's view that it is unfair that the cost of a licence is higher in Chiltern District than neighbouring Wycombe District. We would also support that the licence be renewable every two years in the future instead of annually.*

**Collection of drivers (with approximately 66 unverified signatures):**

*Vehicle in an unclean condition:* *Is this meant to mean inside or outside of the vehicle? There is no reason/ excuse why your vehicle should not be clean on the inside, on occasions the vehicle can become unclean on the inside due to customers certain lack of respect for having open beverages, food etc and leaving the rubbish behind. We do ask in a polite manner not to bring open beverages and food litter into the vehicle , but due to responses and abuse that some customers do give us due to intoxicification, we tend to let them as confrontation could start and things could get out of hand, we are here to earn a living not to have arguments with customers and the public. Sometimes to keep the vehicle clean on the outside can come with great difficulty due to weather conditions. However specially if you work in the evening, there have been times where passengers are under the influence of drink and or drugs manage to abuse the vehicle and be silly by causing malicious damage inside and out, it is hard to stop the car and ask or confront passengers to get out the vehicle for there abuse when they are under the influence and most passengers exceed over three at a time.*

*Hackney Carriage left unattended on a rank* *As hackney drivers we pay a fee for the*

*rank, we only leave the vehicle unattended for the use of the public toilets, which at most times are by the ranks, some of us including myself have medical conditions such as weak bladder, so to park close to the public facility's is very useful, we also use the ranks to go use the local café just to get some breakfast and a coffee as some of us work from 4am and skip breakfast, as we only lead the carriage for no longer than 10 minutes and as we do pay a yearly fee for the use of the rank we should be entitled to use it for public facilities and a coffee break as driving can be a tiring job. There are also drivers that come from out of town to work so the facilities are beneficial to them.*

**Individual Response:**

*Ability to work in other districts - dual application process i.e. South district and Chiltern, Police to apply criminal proceedings rather than civil actions more driver security and safety. Fare Increase – Every year inflation rate. More taxi ranks*

*Amersham - High Street  
Old Amersham – High Street  
Great Missenden – Station Road  
Chalfont St Giles – High Street  
Chalfont St Peter – High Street  
Seer Green Station – Seer Green Station  
Little Chalfont - Chalfont parade  
Holmer Green – High Street*

*Hackney carriage / Private hire badge renewal proposal – lower the fees and extend renewal to 3 years. Hackney carriage / Private hire plate renewal proposal – lower the fees and extend renewal to 3 years Medical reports proposal – fix medical price and Medicals can be done by any GP or Medical centre in the Chiltern District. Vehicle Compliance proposal - We would like to abolish the six month compliance of vehicles over six years and should go back to yearly compliance and have a cap on vehicles of ten years old. Hackney badge holders proposal - Current hackney carriage drivers can drive a private hire – Dual badge.*

**Trade Workshop:**

*Seat Belts – Comment on historical condition that when driving the vehicle licensee shall wear a seat belt at all times.*

*Requirement to carry/produce Byelaws- The necessity to carry bylaws in the vehicle was questioned.*



**APPENDIX 3: OFFICIAL CDDA Response (As submitted)**

Taxi Licensing Consultation  
Chiltern District Council,  
King George V House,  
King George V Road,  
Amersham ,  
Bucks, HP6 5AW.

28 September

2012

Dear Sirs

**CHILTERN TAXI DRIVERS' ASSOCIATION'S RESPONSE TO HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE POLICY**

Please find below a response from the Chiltern Taxi Drivers' Association (CTDA) on the consultation document.

**PROPOSED POLICY 1: That both new and existing drivers will be required to attend and participate in disability awareness training.**

CTDA has no objections to this and would like to add that many drivers have already undertaken disability awareness training.

**PROPOSED POLICY 2: A relaxation on the requirements for a new medical to be submitted when a current medical is already held at the time of application.**

CTDA would welcome this change to the current requirements, since such medicals can cost in excess of £120 and puts an unnecessary financial strain on drivers. If there is an unexpired current medical at the time of application, then it seems logical not to have another medical.

**PROPOSED POLICY 3: A reduction in fees for those vehicles rated at band A, B or C for road tax<sup>3</sup> purposes i.e. less polluting vehicles.**

CTDA is supportive of any proposal aimed at reducing air pollution and therefore has no issues with this proposed policy.

**ADVERTISING**

CTDA would like further clarification on what 'statutory provision' includes.

CTDA supports having door stickers on vehicles as long as they display the taxi company's name and contact number. This is important for customers as it allows them to identify the taxi that they have booked.

**PROPOSED AMENDMENT 4: Additional guidelines to assist in decisionmaking and the strengthening the relevance of conditions.**

CTDA is keen to support initiatives that remove dangerous drivers from the roads so has no concerns on this amendment. However CTDA would like to stress the fact that each case should be considered on an individual basis rather than a blanket approach being adopted whilst making decisions.

**PROPOSED POLICY 5: The adoption of a points based system**

CTDA has serious reservations on this proposal as overall it seems unfair and a bit extreme. It is our view that taxi drivers would, in effect, be punished twice for minor offences, once through the courts and then again by Chiltern District Council affecting their livelihood. We believe the points system is excessively punitive and just duplicates work and is not required as there are already other safeguards in place. In addition to this the point system is bureaucratic and will be more time consuming than the current system.

The current system at CDC is working well and CTDA feel that these changes are only being suggested so that 'something different' and new is being implemented rather than changes being suggested that are in fact productive and required.

While noting the Bracknell system was only an example, we feel it appropriate to comment on this scoring system in detail in light of its potential implications for all drivers.

Unlicensed vehicle 12 points – *no objections as we deem this a serious offence punishable by law*

Driving with no valid insurance 12 points - *no objections as we deem this a serious offence punishable by law*

Failure to wear or display driver badge 6 points– *we consider the points too high on this trivial offence particularly with the licence clearly displayed on the vehicle. Another point to raise is that it would be useful if the badges were smaller (similar size to your CDC work badges) so that they could be worn around the neck.*

Failure to notify conviction, caution or fixed penalty notice 6 points – *points too high. CTDA feels that the current process of notifying CDC of any convictions, cautions, or fixed penalties is sufficient and working well and therefore feel that a point system is not required. CTDA would like to ask if currently the local police authority notify CDC of convictions, cautions or fixed penalties.*

Hackney carriage left unattended on rank 4 points – *There should be no points for this. It is inevitable that drivers will need to leave vehicle for a short amount of time if only to get fresh air and be save to drive. It is common knowledge that in terms of health and safety individuals are recommended to take short comfort breaks from work, in the case of drivers these tend to be*

*for a few minutes at a time, and are important for their wellbeing and to ensure that they are alert whilst driving. Further down you have mentioned that you are proposing the issue of 6 points for smoking in vehicles. We appreciate that not smoking in the vehicles is to create a clean and pollution free atmosphere in the vehicles, nonetheless smokers feel that they need to smoke. So if they are not allowed to smoke in their vehicles then surely they should be allowed to leave their vehicles for this purpose. The issues raised under this proposed point system appear contradictory.*

Private hire parked on a rank 6 points – no objections to this, as *private hires are would be acting illegally by parking at ranks.*

Failure to notify an accident 4 points – *greater clarity is required. How serious is ‘an accident’ to be reported?’*

Behaving in a disorderly manner 4-12 points – *again a definition is required of what is considered to be disorderly.*

*CTDA support the fact that disorderly behaviour should be addressed appropriately. However, CTDA is also disappointed there is no mention of protection and support for drivers who suffer from public disorderly conduct. As Licensors of Chiltern District area drivers, we feel that CDC should show some obligation to provide support and protection towards its drivers. Details of several cases can be provided, where drivers have been verbally/physically abused and their vehicles damaged yet no support was provided by CDC to them. This treatment seems unfair as it implies that CDC only looks to punish disorderly behaviour if carried out by drivers and not vice versa.*

Failure to comply with traffic sign or signal 4 points – *punishable with points on the licence so we see no need for further punishment from CDC*

Illegal tyres (per tyre) 3 points – *points seem too high*

C & U regulations 2-4 points - *CTDA do not know what this is*

Smoking in Vehicle 6 points - *no objections, however please see point raised about drivers leaving vehicles unattended for a few minutes.*

No Smoke free signage 6 points - *no objections*

Unlicensed driver 12 points - *no objections, this is a serious offence*

Driving with no valid MOT /inspection 12 points - *no objections, this is a serious offence*

Failure to display plates or stickers 6 points - *no objections*

Failure to provide MOT, inspection or insurance documents 4 points –*this seems to high. Please could you clarify what is meant by ‘failure’ to provide. Drivers do not completely fail to provide documents as their licenses would be revoked by this. However they do at times provide their documents late, for*

*which they are charged £25.00, therefore at present there is already a fine and system in place to deal with the late provision of documents.*

*Contravention of Stop Notice/suspension 12 points –Please could further explanation of this be provided.*

*Private Hire plying for trade 12 points – strongly agreed as their insurance is invalid if they do this.*

*Failure to notify change of details 4 points - more clarification needed. How much/little information is required? At present drivers immediately notify CDC of changes such as changes to vehicles.*

*Vehicle in unclean condition 4 points – this seems harsh. Drivers clean regularly but after continuously being driven with passengers in them they can get a little untidy. However the drivers do clean their vehicles regularly.*

*Use of hand held phone while driving 6 points - no objections if a statutory organisation such as the police have evidence of this. However it is difficult to prove an issue if there is no evidence and it is purely based on a complaint by for example a customer.*

*Overcharging 6 points – CTDA have serious reservations about this. Prices of journeys are either calculated through meters or are a fixed price determined prior to the journey commencing. Often journeys cost more if traffic is heavier. Customers then may feel over-charged even when they are not. Where does the burden of proof lie?*

*Too many passengers 8 points – no objections as this is not safe. However we would like to highlight that customers often ask for journeys where there are too many of them and they are told that we are not able to transport more than a certain number per licensed vehicle.*

*Horn misuse 4 points – again contentious. Who determines this? Often drivers need to use horn to get vehicles moving who are blocking their exit. An example of this is at Amersham Station, where other drivers often block in taxis with passengers. This frustrates our passengers and they consequently ask the drivers to use their horns to encourage the other cars to give way. Does this constitute misuse?*

*Illegal use of bus lane 4 points – no objection to the principle*

**PROPOSED POLICY 6: Requirement for a ‘police report’ for new applicants that have lived in the UK for less than 5 years.**

CTDA has no objections to this.

**PROPOSED POLICY 7: The introduction of minimum age criterion and PROPOSED POLICY 8: Replacement vehicles**

CTDA has very strong objections in respect of this. Chiltern District Council's own recent study has shown that licensed taxi drivers are traditionally low earners, yet, even in the times of economic downturn, drivers are expected to buy new cars even though existing ones are clearly roadworthy and indeed go through more rigorous tests than normal vehicles. This rule would undoubtedly result in many drivers and firms going out of business. Surely market forces will determine whether customers wish to use vehicles over five years old so long as they are roadworthy.

Please see attached document to support this issue.

CTDA would also like to add that overall, the fleet of taxis in the Chiltern District compared to other local areas are of a better standard.

### **PROPOSED POLICY 9: Strengthening the checks involved to receive an executive plate:**

There are no objections to this. However CTDA would like to point out that It was CDC itself that relaxed the requirements of issuing executive plates, and subsequently CTDA feel that CDC are responsible for the abuse of the executive plates by doing so.

### **PROPOSAL POLICY 10: Removal of existing requirement to notify the Council**

Please could you clarify this.

### **PROPOSED POLICY 11: minimum size and removal of alternative to words 'taxi'.**

Again we believe this to be an unnecessary extra cost to drivers (around £70 plus) when most such vehicles are clearly recognisable as taxis.

### **ANY OTHER BUSINESS:**

- Drivers have put forward an objection to the requirement to have clear windows. Many such licensed vehicles have tinted windows in London and therefore fail to see why Chiltern drivers should be penalised for having tinted windows. In London, Addison Lee is the largest operating taxi vehicle fleet and their vehicles have tinted windows. It is estimated it would take approximately £600 to alter such windows on the many existing vehicles with this accessory.
- CTDA would like to put forward a proposal that taxi badges are renewed every 2-3 years like in neighbouring areas such as High Wycombe. This would be preferable to drivers and would also save time for CDC staff and be less bureaucratic than the current system of the badges being renewed annually.
- CTDA would like the opportunity to further discuss other issues such as taxi roof lights, door panels, and new private hire vehicles with CDC.

We welcomed the opportunity to comment on these proposals but would say, in conclusion, that the majority of them appear to be putting a greater burden on taxi drivers, particularly financially, in a very difficult economic period and do fear that, if implemented, it may put many more people out of work as well as offering less choice to the general public.

**APPENDIX 4: GENERAL REPONSES (As submitted)**

**Chesham Town Council**

Bill Richards  
*Town Clerk*



Tel: 01494 774842  
Fax: 01494 582908  
[www.chesham.gov.uk](http://www.chesham.gov.uk)  
Email: [admin@chesham.gov.uk](mailto:admin@chesham.gov.uk)

Taxi Licensing Consultation  
Chiltern District Council,  
King George V House,  
King George V Road,  
Amersham  
Bucks,  
HP6 5AW.

Our ref:

Dear Sirs

**RESPONSE TO HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE POLICY**

Chesham Town Council considered its response to the above consultation document at its Development Control Committee meeting on the 15<sup>th</sup> October 2012.

I am to say that the Council broadly supports the comments submitted by the Chiltern Taxi Drivers' Association in its response to the consultation other than where specified below. Specifically the Council would like to make the following observations:

- In respect of Advertising, the Council believes there should not be a requirement restricting taxi company names on any signage since this will only make it harder for passengers to recognise taxis they have ordered.
- In light of the current economic climate, the Council believes that a rigorous enforcement of the policy that proposes the introduction of a minimum age criterion for vehicles (proposed policy 7) would be unfair and have a negative effect on the livelihood on many local taxi drivers. As an

aspiration, the Council believes that, if such a policy is introduced, there should be a moratorium until there is a definite and sustained upturn in the economy.

- Regarding proposed policy 9, (in a similar vein), the Council believes that the conversion of existing vehicles to ensure that they have clear, non-tinted windows would have a significant financially damaging impact on drivers. The Council suggests that such proposals are only applied to newly registered vehicles thereby phasing in the licensing requirements as and when vehicles are replaced.
- Regarding proposed policy 11, the same argument applies as above. No immediate enforcement for the size on existing registered taxis, but this should apply to all new vehicles
- While the Council does not necessarily agree with all the detailed submissions made by the Chiltern Taxi Drivers' Association in respect to the adoption of a points based system (e.g. display of drivers' badges), we do question whether a points system is required at all as we are not convinced that the current system is not working. If, as appears, the current system is operating satisfactorily, then we do not see the necessity of introducing an overly bureaucratic new system. Any new system would need detailed consultation with the taxi drivers.

Finally, while not part of the consultation per se, the Council would like to express its support for the Chiltern Taxi Drivers' Association's view that it is unfair that the cost of a licence is higher in Chiltern District than neighbouring Wycombe District. We would also support that the licence be renewable every two years in the future instead of annually.

If you require any further clarification on the above, please don't hesitate to contact me.

Yours faithfully

Bill Richards  
Chesham Town Clerk

















**From:** REDACTED  
**Sent:** 05 August 2012 12:02  
**To:** TaxiLicensing  
**Cc:** Nigel Shepherd  
**Subject:** FW: Hackney Carriage & Private Hire Taxi Licensing Policy Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Blue

My only comment on the proposed policy is to question the suggestion that we obtain police reports from foreign countries as additional bona fides for prospective drivers. My objections to the suggestion are:

- 1) These reports will be an additional expense to drivers making applications to CDC
- 2) Processing these reports will be an additional cost to CDC
- 3) I would expect the time involved in obtaining reports from countries outside Northern Europe would add significant delay to the application process
- 4) Would we really place uncritical reliance on every police report received? Isn't it likely that some countries police authorities would be less reliable than others in making objective reports?
- 4) If the Home Office has satisfied itself that an immigrant is fit to live and work in this country, why would we as a local authority effectively place no confidence in immigration checks by asking for a foreign police report? If an immigrant is making the effort to work to support himself and his family rather than being a drain on the benefit system shouldn't that be taken as good evidence that he does not have a criminal past overseas or that if he does he is attempting to change his life for the better by coming to this country and looking for work?

thanks  
REDACTED

---

**From:** REDACTED  
**Sent:** 06 October 2012 07:38  
**To:** Ben Coakley  
**Subject:** RE: Taxi Policy Consultation

Dear Ben Coakley

We have no objections to the amendments/ alterations in the document.

Kathleen Martin  
Chairman  
Chalfont St Giles Revitalisation Committee

---

**From:** REDACTED  
**Sent:** 18 September 2012 09:30  
**To:** TaxiLicensing  
**Subject:** RE: TAXI CONSULTATION

To whom it may concern.

Further to my telephone conversation with ROBIN I am emailing you regarding the trade-marking of not only the REDACTED brand name but also the REDACTED brand colours which are REDACTED .

Our logo is clearly displayed on all of our vehicles and marketing and we believe it clearly distinguishes us from our competitors which make our cabs more recognisable for our customers.

There are many vehicle operators in the area and as we are attempting to distinguish ourselves from our competitors so should they.

So therefore we sincerely hope that you will raise this issue in your next Taxi and Private Hire Policy Consultation as the trademark of our logo and colours are important for us and our customer base.

We believe that local firms, in competition with us, would be more than happy to abide by any ruling which would make us clearly distinguishable from them.

Many Thanks.

REDACTED

---

**From:** REDACTED

**Sent:** 01 September 2012 04:19

**To:** TaxiLicensing

**Subject:** wheelchair accessible taxis

Dear Licencing, It appears that your consultation is null and void due to the Law commissions intervention, they are about to introduce new rules for taxis and PH cars. Even if they had not intervened, the consultation is a waist of time, as the former equity bill stated that saloon and other vehicles must be licenced as taxis so that all disabled have access to a cab.

In areas where all taxis are wheelchair accessible, 98% of drivers have never had to carry a wheelchair passenger, as most WC passengers prefer a saloon or MPV if they can transfer, and taxi owners have been forced to pay out huge sums of money to buy a WC vehicles when they wont be used for WC, and customers will start using the PH cars instead, as most people do not like the WC cabs.

Most large towns and city's have dedicated wheelchair company's so why not just ask your local dial a ride company to put on a few more vehicles and leave the taxis alone.

Regards

REDACTED

---

**From:** REDACTED

**Sent:** 23 July 2012 13:57

**To:** TaxiLicensing

**Subject:** Hackney Carriage and Prive Hire vehicle policy

**Importance:** High

Hello

I have read through the proposed policy document and feel all proposed policy changes should not take place and am against all of the changes proposed.

You have neglected to take in consideration of drivers proposed changes and are dictating the council changes.

I am soory but i am totally against your proposals.

Many Thanks

REDACTED – PERSONAL DATA

---

From: REDACTED  
Sent: 17 September 2012 18:44  
To: TaxiLicensing  
Subject: New taxi policy

Follow Up Flag: Follow up  
Flag Status: Blue  
Dear Licensing,

I think having a vehicle no more than 4 years old on first license application is too low. With this policy you will put a lot of taxi drivers out of work because they will simply not be able to buy/afford newer vehicles.

Do you really want people to be out of work and claiming benefits in the current economic climate?

Please reconsider and cancel this policy or at least delay it for a few years.

Many thanks,

REDACTED

---

From: REDACTED  
Sent: 19 September 2012 20:28  
To: TaxiLicensing  
Subject: Taxi Policy

Follow Up Flag: Follow up  
Flag Status: Completed

Dont agree with these new proposals that you have broughtt across.  
<http://www.chiltern.gov.uk/taxipolicy>

THANKS

---

**From:** REDACTED  
**Sent:** 21 September 2012 11:30  
**To:** REDACTED  
**Subject:** Taxi licensing consultation

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Red  
Please see below list of outstanding issues to address.

Please can you not make any changes to the existing Taxi licensing policy - ALL IS FINE HOW IT

IS!!!!

## List of outstanding issues:

1. Ability to work in other districts - dual application process i.e. South district and Chiltern
2. Police to apply criminal proceedings rather than civil actions more driver security and safety.
3. Fare Increase – Every year inflation rate.
4. More taxi ranks

Amersham - High Street  
Old Amersham – High Street  
Great Missenden – Station Road  
Chalfont St Giles – High Street  
Chalfont St Peter – High Street  
Seer Green Station – Seer Green Station  
Little Chalfont - Chalfont parade  
Holmer Green – High Street

5. Hackney carriage / Private hire **badge** renewal proposal – lower the fees and extend renewal to 3 years.
  6. Hackney carriage / Private hire **plate** renewal proposal – lower the fees and extend renewal to 3 years
  7. Medical reports proposal – fix medical price and Medicals can be done by any GP or Medical centre in the Chiltern District.
  8. Vehicle Compliance proposal - We would like to abolish the six month compliance of vehicles over six years and should go back to yearly compliance and have a cap on vehicles of ten years old.
  9. Hackney badge holders proposal - Current hackney carriage drivers can drive a private hire – **Dual badge**.
  10. **No change to the existing policy document all proposals are bias.**
-

**From:** REDACTED  
**Sent:** 19 September 2012 01:08  
**To:** TaxiLicensing  
**Subject:** Taxi License Proposals

**Follow Up Flag:** Follow up  
**Flag Status:** Blue  
Hello,

I disagree with the points system that has been proposed, some of the contraventions listed are ridiculous, why would a driver with out a license care if they get any points?? Also how would a driver without vehicle insurance or MOT get a taxi license in the first place and if they were driving without a license they would not be affected by any points. Most of the contraventions already lead to points on your drivers liscence or a fine, e.g: using a hand held phone while driving, illegal tyres, no MOT/insurance, too many passengers, illegal use of bus lane etc.

In my opinion the whole point system is a big waste of time.

Kind Regards.  
REDACTED

---

**From:** REDACTED  
**Sent:** 23 July 2012 16:34  
**To:** TaxiLicensing  
**Subject:** review the decision of age vehicles

**Follow Up Flag:** Follow up  
**Flag Status:** Blue  
Dear officer,

My name is REDACTED.i would like to request you to review the decision made on the age of vehicles .this is not acceptable becoz the price of 4 years old car is around 12000 to 15000 pounds .no one can afford the price .if this limit is 8 years then its affordable for every one . and the people got exective cars for their journes.At the moment chiltren district council got more exective cars in bucks county council. your this decision may increased the level of unempolymnt. that is my point.i dont know how you think. i hope you will review your new policy stated below.  
your sincerly ,  
REDACTED

**PROPOSED POLICY 7: The introduction of minimum age criterion.**  
**The option**

**to amend conditions to require that vehicles should be no older than 4 years at initial application and no older than 10 years on subsequent renewal, and that the standards of appearance condition should be an indicator as to the condition the vehicle should be kept in during the licence period, and should not be a reason to licence an older vehicle. This should help ensure a modern fleet compliant with**

European Standards on safety and emissions, and would still enable the trade to pick up suitable vehicles for a reasonable price. The potential to exempt historic vehicles may be considered as part of this proposal.

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The age limit may be exceeded if the vehicle complies with the standards for conditions of appearance of a private hire vehicle

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All vehicles shall not be more than 4 years old when first licensed and should not be older than 10 years in the case of any subsequent application for renewal of license. The age of the vehicle will be taken from the vehicle registration document.

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From: REDACTED  
Sent: 22 September 2012 14:51  
To: Licensing  
Subject: disagree

Follow Up Flag: Follow up  
Flag Status: Red

dear sir/ madam

i am writing regarding your new policy proposal. My view towards some of the statements are negativity especially towards the car age which proposed that one can only use a car which is under 4-9 years old. i personally think it will make things more difficult and aswell as that purchasing a car under 4 years old is quite expensive and not everyone is financially stable.

my car is under 10 years old and it has passed the MOT and complience. i do not see any point for a policy as such as the taxi cars go under complience every six months. everyone was favourable for the previous policy and we should continue on that policy. i hope you understand what point i am making. i hope to hear from you soon.

thanks  
REDACTED