



Regulatory & Appeals Committee

Date: Monday, 13 February 2017
Time: 7.00 pm
Venue: Council Chamber
District Council Offices, Queen Victoria Road, High Wycombe Bucks

Membership

Chairman: Councillor J A Savage
Vice Chairman: Councillor Mrs L M Clarke OBE

Councillors: S Broadbent, M Clarke, A D Collingwood, C Etholen, R Gaffney,
M Hussain JP, D Knights, I L McEnnis, R Raja and Ms J D Wassell

Standing Deputies

Councillors: K Ahmed, Miss S Brown, A R Green and Mrs G A Jones

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Agenda

- | Item | Page |
|--|------|
| 1. APOLOGIES FOR ABSENCE
To receive any apologies for absence. | |
| 2. MINUTES
To confirm the minutes of the meeting held on 17 October (previously circulated) | |
| 3. DECLARATIONS OF INTEREST
To receive any disclosure of disclosable pecuniary interests by Members relating to items on the agenda. If any Member is uncertain as to whether an interest should be disclosed, he or she is asked if possible to contact the District Solicitor prior to the meeting.

Members are reminded that if they are declaring an interest, they should state the nature of that interest whether or not they are required to withdraw from the meeting. | |

Item		Page
4.	VARIATIONS TO HACKNEY CARRIAGE AND PRIVATE HIRE POLICY	1 - 42
5.	ACTIONS TAKEN UNDER DELEGATED AUTHORITY Submission of the file on Actions taken under delegated powers since the last meeting.	
6.	SUPPLEMENTARY ITEMS (IF ANY)	
7.	URGENT ITEMS (IF ANY)	

**For further information, please contact Iram Malik 01494 421204,
committeeservices@wycombe.gov.uk**

Agenda Item 4.

VARIATIONS TO HACKNEY CARRIAGE AND PRIVATE HIRE POLICY

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Wards Affected: All

PROPOSED RECOMMENDATION

Having taken into consideration the comments received as part of the consultation exercise, the Committee is asked to consider the proposed amendments to the Hackney Carriage and Private Hire Policy and conditions as described in the report below and recommend the revised policy to Council for approval to become effective from the 1st of April 2017.

Executive Summary

Members will recall that they considered proposed amendments to the Hackney Carriage and Private Hire Policy for the purposes of a consultation exercise at their meeting in October last year. The consultation has now concluded and Members are asked to re-consider the proposed amendments in light of the comments received.

Corporate Implications

The Council is required by law to license the operation of taxis and private hire vehicles. The paramount consideration in this respect is the safety and convenience of those travelling in licensed vehicles. The Local Government (Miscellaneous Provisions) Act 1976 permits local authorities to place conditions on licensed private hire and hackney carriage drivers and vehicles. Conditions should be aimed at improving service and protecting the users of licensed vehicles.

Policy/Community Plan Implications

The amendments suggested would contribute to all of the objectives set out in the Corporate Plan.

Detailed Report

1. The Hackney Carriage and Private Hire Licensing Policy was last formally reviewed in 2012. Further review was postponed until now due to anticipated comprehensive changes in licensing law as a result of a Law Commission report in this area. This report did not, however, result in any significant changes and so it was considered appropriate to review and update the policy.
2. Further to approval from this committee, the draft revised policy was subjected to a 12 week consultation exercise with all current licence holders, along with other relevant bodies, organisations and individuals representing all sections of the community.

3. Meetings were also held with both the hackney carriage and private hire trades so that views could be aired and questions answered.
4. Copies of all of the comments received have been appended to this report for information and a summary is provided below along with responses.

HACKNEY CARRIAGE TRADE

5. The hackney carriage trade provided a document following our meeting with them in December, a copy of which is at (Appendix A). The comments relate to 4 main issues as detailed below.

Rear Loading Wheelchair Accessible Vehicles

6. The draft revised policy included a proposal to permit rear loading wheelchair accessible vehicles, which have not previously been authorised as hackney carriages. Several comments were received from individuals in support of this proposal, which was also generally supported by the private hire trade. A large section of the hackney carriage trade, however, is opposed to this proposal on the grounds of public safety.
7. They state that rear loading vehicles would not be suitable for use as hackney carriages given that the passenger might have to be loaded from the road and may have to negotiate a kerb to access the rear of the vehicle, which would be extremely difficult for those using power wheelchairs. It is also stated that the position of the wheelchair user falls within the “crumple zone” of the vehicle in the event of an accident and that there would be no alternative means of escape.
8. The trade have quoted reports by national organisations such as RADAR, Scope, and Disabled Persons Transport Advisory Committee who state that rear loading wheelchair accessible vehicles should not be used as hackney carriages for the above reasons. They have also quoted the Department for Transport’s Best Practice Guidance which also recommends the use of side loading vehicles for similar reasons.
9. The trade finally have finally stated on this issue that should rear loading vehicles be permitted as hackney carriages, a formal risk assessment should be carried out on individual vehicles.
10. Benchmarking has been carried out on this issue and advice has been sought from organisations dealing with disabled people and those dealing with vehicle safety. The outcome of this research has proved to be far from conclusive. There is no consistency between authorities on this subject and apparently no definitive answer in terms of suitability. Many authorities permit rear loading WAV’s so long as the vehicle has

been issued with an Individual Vehicle Approval certificate. Some authorities also have conditions about the vehicle being in a suitable and safe location to load wheelchairs.

Age Limits for Wheelchair Accessible Vehicles

11. The trade consider that the existing age limit of 14 years should remain in place for all wheelchair accessible vehicles on the basis that these vehicles cost more than saloon vehicles and that drivers are struggling to earn a reasonable wage. They have suggested that a more appropriate age would be 12 years.
12. It is considered that the vast majority of wheelchair accessible vehicles over the age of 10 years are not in a suitable condition to continue to be licensed due to their high mileage and general wear and tear. It is accepted, however, that some vehicles will continue to be in an acceptable condition and that these would be permitted to be licensed further to inspection and specific approval by a licensing officer. It would be expected that such vehicles would have clean bodywork which is free of dents, scratches and rust and that the interior of the vehicle would also be in a clean, undamaged and unworn state.
13. It is always possible to depart from policies in appropriate circumstances, but for the avoidance of any doubt, it is suggested that the policy be amended to make specific allowance for vehicle to be licensed in exceptional circumstances beyond the usual 10 year proposed period, where express consent has been given by a Licensing Officer. Any licence would in any event cease once the vehicle reaches 14 years old.

Tinted Windows

14. The trade have requested that the requirements in relation to tinted windows are relaxed even further than the current proposal of 60% light transmission. Their suggestion is that any manufactured tint should be permitted. This is based on the findings of a survey conducted across 43 police forces which suggested tinted windows have never contributed towards the commission of any offence or alleged offence by anyone in a taxi.
15. It is suggested that the findings of this survey may be misleading and / or misrepresentative for 2 reasons. Firstly, a large number of local authorities do not permit heavily tinted glass in licensed vehicles and so these would not be included in any such survey and secondly, it is extremely unlikely that the tint level of the glass in a vehicle would be recorded when police investigate any offences which take place in licensed vehicles.

16. As stated in the previous report on this issue, research has been carried out with all of the major vehicle manufacturers on this subject and they have confirmed that standard models would all generally comply with a tint level of 60% light transmission. The only exception to this appears to be the Toyota Prius Plus which comes with standard factory tint of less than 30% light transmission, making visibility into the rear of the vehicle almost impossible. Operators are continuing to purchase and use this model of vehicle, although they have to pay in the region of £800 per vehicle to have the rear glass replaced.
17. It is agreed that it is very unfortunate that an environmentally friendly vehicle is manufactured with entirely unsuitable rear glass and a letter has been sent to Toyota explaining that this model is widely used for private hire purposes and that it would not comply with the majority of local authorities tinting policies.
18. For public safety reasons, it is considered that there should be a clear view of the inside rear of licensed vehicles, both for the protection of the public and for the driver. As such, it remains the opinion of officers that the tinting level should only be reduced from 70% light transmission to 60% light transmission.

Warnings / Advisory Notices

19. The trade have stated that they do not consider that any warning or advisory letters should remain on file or be taken into consideration for more than 3 years, regardless of any other issues which may have arisen during this period of time. They have stated that it is unfair to keep records of any complaint on file for longer than 3 years.
20. The current policy in relation to complaints and other enforcement issues is that a record of any warning or advisory notice will be retained on file and taken into consideration for a period of 3 years, unless further matters arise during that period in which case the original warning or advisory notice will continue to be taken into consideration until a clear period of 3 years has passed where there have been no complaints or other issues have arisen.
21. The purpose of this policy is to establish whether there are any patterns of behaviour which cause concern as to a driver's fitness to hold a licence to drive members of the public. This is particularly the case in relation to driving standards and behaviour.
22. It was explained to the trade at the meeting in December that every case is treated on its own merits, that careful consideration is given to cases where formal action may be taken against a licence and that officers fully appreciate that in many cases a driver's licence will be their livelihood. It was further explained that any decision to revoke a

licence would generally be taken in conjunction with the Council's Legal Services department.

23. Although the number of licences which have been revoked as a result of repeated complaints under this policy is relatively low, it is considered to be an important tool in considering whether a driver can still be considered "fit and proper" to hold a licence. It is therefore suggested that this aspect of the policy should remain unchanged.

PRIVATE HIRE TRADE

24. Following our meeting with the private hire trade in January, they also submitted a document laying out their concerns and comments in relation to the policy and these are detailed below. A copy of the document is at (Appendix B)

Minimum Seat Size Requirements

25. The trade do not consider that there is any need to have minimum seat and leg room dimensions in licensed vehicles and state that no complaints have been received in relation to this matter. They agree that some vehicles offer less leg room but state that the difference is small and that it would not cause a problem unless the passenger was large. They further state that most journeys taken are short and therefore this is not an issue. The trade have also requested a definitive list of vehicles which would comply with the proposed policy.
26. At the meeting, the trade also suggested that if a vehicle had been approved for use by members of the public, it should be approved for use as a licensed vehicle.
27. As explained to Members at the last meeting of this committee, and also to the private hire trade at our meeting with them in January, it has come to the attention of officers that some seats in the front of certain vehicle models are entirely unsuitable for an adult passenger, in that they provide virtually no leg room and require the passenger to sit at an inappropriately close distance to the gear stick and driver.
28. It is suggested that the length of the journey is irrelevant in relation to whether a seat is inherently unsuitable and that, in any case, many journeys taken are not short in nature, such as to airports. It is also not possible to place conditions on vehicle licences which specify the size of passenger who is permitted to use specific seats.
29. It is further suggested that the approval of a vehicle for use by friends, family members or colleagues cannot be compared with its approval for use by paying customers where the driver is unknown to them.

30. In relation to the licensing of private hire vehicles, section 48 of the Local Government (Miscellaneous Provisions) Act 1976 requires that vehicles are suitable in size, type and design and are safe and comfortable for use.
31. Having carried out benchmarking, both locally and nationally, I can confirm that requirements in relation to seat dimensions are extremely common, with the majority specifying minimum leg room and a minimum seat width of 16 inches.
32. It is therefore considered that this requirement, which was previously a condition of vehicle licensing in Wycombe, should be implemented both from a comfort and safety perspective for passengers.

Tinted Windows

33. The trade have stated that the proposed tinting policy is unnecessary in 95% of the vehicles that are likely to be licensed. They have requested that the tint policy is removed or that only vehicles with very dark tints are restricted. They have further stated that other Councils are in the process of removing, or have already removed, their tinting policies.
34. This issue has been dealt with above at paragraphs 14 – 18, where it is agreed that the Toyota Prius Plus is manufactured with very dark tint in the rear glass which is unfortunate. Benchmarking has revealed that Slough Borough Council has recently relaxed its policy in relation to tinted windows to allow manufactured tint, although no other authorities in the surrounding area are known to have either recently changed their policies in this respect or that they intend to do so.

Age of Wheelchair Accessible Vehicles

35. The trade have raised concerns about the proposal to reduce the age limit of wheelchair accessible vehicles due to the cost of purchasing this type of vehicle. This issue has been addressed at paragraphs 11 – 13 above.

Notification of Offences

36. The trade considers that the requirement to notify the Licensing Unit if they have been charged with any offence within 72 hours is too stringent and that only serious offences such as murder or sexual assault should need to be notified this quickly. They consider that for all non-serious offences, notification should only be made on conviction, not at the time when the driver is charged.
37. It is considered to be vitally important that the Licensing Unit is notified of any criminal offence in a timely manner so that necessary action can

be taken in appropriate circumstances. It is also impossible to provide a definitive list of “serious” offences given that some motoring offences may be considered to be serious and may depend on the specific driver’s previous history. It is also considered important to have a consistent policy in relation to all offences so that there is no confusion as to the action required to be taken.

Knowledge Test

38. The trade have stated that the current knowledge test is very difficult, that it is too expansive in its coverage and that the pass rate is very low. The trade have requested that the number of questions should be reduced to about 15-20 questions and that some questions relating to knowledge of the district should be removed. The trade have also suggested that a simplified version of the conditions should be produced.
39. Although not falling strictly within the purview of this policy review, this issue was discussed at the meeting in January and it was agreed that the test would be reviewed with representatives of the trade so that any questions which are not considered to be sufficiently clear in meaning can be reworded or removed. It was also agreed that a simplified version of the conditions would be produced to assist new applicants and existing drivers, although the actual licence conditions would obviously remain the mandatory document.
40. It is, however, considered that applicants should be tested on their knowledge of the district, along with the conditions of the licence, the Highway Code and customer care / disability awareness. It is not therefore suggested that the content of the existing test should change.

Medical Testing

41. The trade consider that the medical certificate should be able to be completed by any practitioner registered with the General Medical Council (GMC). Drivers are currently required to have the certificate completed by a doctor at their registered surgery although the trade states that some surgeries are charging up to £200 for this service and that there can be significant delays in obtaining an appointment. They further state that appointments can be obtained elsewhere within a short period of time and that the cost can be as low as £50. The trade also state that any doctor can have access to the patient’s records if provided with their NHS number.
42. The current requirement for medical certificates to be completed by a driver’s registered surgery was implemented as a result of fraudulent certificates which were provided by persons who were not registered with the GMC and who did not have access to the applicant’s full medical records.

43. Having made enquiries with the NHS, it has been confirmed that it is possible for patient's records to be shared with different surgeries, although this is a new system and has been little used by members of the public. It is also not clear whether records can be shared between different NHS Trusts or whether they can be shared with private doctors. It is also possible that full details for some ongoing treatments or health investigations may not be provided within shared notes.
44. As a result of this, it is suggested that in the interests of public safety, the existing requirements in relation to medical certificates should remain in force.

Driving Standard Test

45. The trade considers that applicants (and existing drivers in certain circumstances) should not be required to undertake an additional practical driving test for licensed drivers. They consider that this is unnecessary given that they will already have taken and passed a practical driving test and they believe this test to be no different.
46. The DVSA, which previously provided the practical test for licensed drivers, set out criteria for testing which were aimed specifically at licensed drivers. The new test providers use these same criteria to ensure that any applicant is capable of driving at an acceptable level for a licensed driver who carries members of the public for financial gain.
47. It is considered that, as a result of being professional drivers, hackney carriage and private hire drivers should be tested to a higher standard than those who only drive themselves or friends / family. This is in much the same way as PSV and HGV drivers are required to undertake additional testing.
48. Also, where drivers have moved to this country from abroad, it is not possible to verify the level of testing undertaken in their country of origin and so the requirement to pass a test with set criteria ensures a consistency in driving standards.
49. The DVSA style test is now required almost without exception by any authority for applicants wishing to be licensed to drive hackney carriages and private hire vehicles. It is also known that some candidates have failed the test on their first or second attempt which indicates that it is a reasonable and necessary requirement.

Bus Lane Use

50. The trade have requested that private hire vehicles should be permitted to use bus lanes in the same way that hackney carriages are currently

permitted to do so. The trade understands that this falls within the powers of Bucks County Council and they have requested that the County Council is lobbied in this respect.

51. This request has been forwarded to Bucks County Council.

Door Stickers

52. The trade state that the quality of the Council issued door stickers is poor and that the stickers disintegrate and are costly to replace. It is the opinion of the trade that the door stickers are no longer required and that the requirement should be removed due to modern technology which permits text messages to be sent to passengers providing vehicle details.

53. As explained to the trade during the meeting in January, the door sticker provider was changed about a year ago further to complaints about quality and no further complaints have been received since the new stickers have been provided. Many of the previous stickers were also replaced free of charge to licensees where evidence was provided of unacceptable deterioration.

54. In terms of the requirement for Council issued door stickers generally, it is considered that these stickers are an important and effective means of the public and enforcement officers being able to quickly and easily identify a vehicle which has been licensed by this authority. Not all companies use systems whereby the customer is sent a text confirming the vehicle details and not all companies use their own door stickers which would indicate that the vehicle was licensed, although these stickers would not provide confirmation in themselves that the vehicle was in fact licensed.

Executive Licence Plates

55. The trade do not agree with the policy on executive licence plates, insofar as they think that the level of information required is excessive and that such vehicles should be able to be used by any customers.

56. The policy in relation to executive licence plates has been considered by this committee on more than one occasion. The purpose of the policy is to ensure that these vehicles, which have minimal signage to indicate that they are licensed and are permitted to have heavily tinted rear windows, are only permitted to be used for bona fide business people, executives or other persons who may wish to keep their identities hidden from public view.

57. The policy states that reviews are carried out on booking records on an annual basis and further information may be required from new clients

or where the booking records indicate that the operator's business pattern may have changed significantly.

58. In the interests of public safety, it is suggested that no change should be made to the existing policy which has worked successfully since its implementation in 2012.

Change of Vehicle / Variation of Licence

59. The trade have stated that the rules in relation to replacement vehicles have recently been changes without consultation. I can confirm that the new arrangements for replacement vehicles came into force in 2012 further to full consultation with the trade. The new arrangements were brought into force as a result of comments made by a consultant representative of the trade who submitted comments on the draft revised policy which stated that licences cannot be varied and therefore a new licence must be issued.
60. Where operators change a vehicle partway through the licence period, the application is therefore treated as a new application and is processed in the same manner as any other new vehicle application. A discount is given where there are more than 6 months remaining on the original licence, which reflects the cost of enforcement for that period of time.

CCTV / Audio Recording

61. The trade have objected to the proposed new policy in relation to the use of audio recording with CCTV in licensed vehicles and state that they should be able to record audio at all times when the CCTV system is in use.
62. As explained to the trade during the meeting in January and confirmed by information subsequently provided to them, the proposed policy in relation to CCTV is in line with other local authorities and as a result of rulings made by the Information Commissioner which prohibits the use of constant audio recording in licensed vehicles on the grounds that it is a breach of the passengers' human rights.

Complaints Procedure

63. The trade consider that complaints should only be held on file where they have been proved and that the current system permits members of the public to submit multiple bogus complaints under different names.
64. In the experience of officers, it is extremely rare for bogus complaints to be made and they are generally obvious and therefore not taken into

consideration or held on file. Details are requested from the complainant to verify their identity and to confirm that it is a genuine complaint. In the vast majority of cases it is also not possible to prove or disprove any complaint.

65. This issue has been further dealt with at paragraphs 22 – 26.

Certificate of Good Conduct

66. The trade consider that it is unreasonable to require drivers or applicants to provide a certificate of good conduct where they have been out of the country for a period of 3 or more months.

67. The Disclosure and Barring Service is only able to carry out criminal records checks within the United Kingdom and so it is necessary to verify whether a driver or applicant has been convicted of any relevant criminal offences when they have been abroad for an extended period of time.

68. Drivers and applicants appear to have had no difficulty in providing these certificates since the requirement came into force in 2012 and all drivers should now be aware of the requirement and so should be able to apply for the certificate at the local police station in the foreign country before they leave, thereby preventing any delay in a licence being issued.

69. In the interests of public safety it is suggested that the requirement in relation to certificates of good conduct should remain unchanged.

Advertising

70. The trade disagree with the current advertising policy and consider that advertising should be permitted both on the inside and outside of licensed vehicles. They have stated that the majority of advertising would be for local businesses.

71. This issue was discussed during the meeting in January and it was suggested that the trade propose an amended policy which allowed specific and limited advertising, although this has not been received and it would appear that the trade are requesting that any form of advertising should be permitted on licensed vehicles.

72. The majority of licensed vehicles already display signage, issued by both the Council and the use of company stickers, on all four vehicle doors. It is the view of officers that any additional signage on the outside of the vehicle would cause vehicles to look untidy and undermine the message of the requirement to pre-book private hire vehicles.

73. The trade also raised general concerns about the large number of out-of-area vehicles and drivers now working within the district. This concern is shared by officers, although the majority of these vehicles and drivers live within the district and have chosen to obtain a licence from an authority with lower requirements and where it is easier to obtain a licence. It is suggested that lowering standards within Wycombe to the “lowest common denominator” is not an advisable option. Officers are actively working with the 3 main authorities where this phenomenon has arisen in an attempt to resolve the issue. It should also be noted that many operators licensed by this authority are actively obtaining vehicle licences and driver licences for their drivers from these authorities to work in this area.

OTHER COMMENTS

74. In addition to the comments received from the hackney carriage and private hire trades at (Appendices A and B), 14 other comments were received from either individuals or companies, copies of which are attached at (Appendix C). Some of the issues raised relate to those covered above but a summary of comments covering different issues is provided below.

75. 3 comments received were in favour of extending the age limits for licensed vehicles.

76. One comment was received in favour of reducing the age limits of wheelchair accessible vehicles. The commenter went on to approve of the policy generally and to suggest that licensing officers should be given more authority.

77. One contributor stated that it was unfair that hackney carriage drivers are permitted to charge different tariffs depending upon the time of day, whereas private hire drivers are not and that there should be only one price policy. The Council is not permitted by law to set fares for private hire vehicles and so this is purely a matter of market forces.

78. The same contributor went on to state that there should be more saloon hackney carriages given that very few wheelchair users make use of hackney carriages and that hackney carriages should be rear loading as opposed to side loading. They further commented that there should be no requirement for door stickers and that the licence plate should be smaller.

79. 3 comments received requested that the age of wheelchair accessible vehicles should remain at 14 years, unless the Council permit rear loading vehicles, which are cheaper, in which case the age limit could be reduced to 10 years.

80. One comment received stated that the writer did not agree with the new policy but did not provide any further detail.
81. One comment received stated that drivers should be required to have eye tests every 12 months and that for drivers over the age of 60, these should be carried out by an optician as opposed to a general practitioner.
82. One comment requested information on who would provide the CSE training and whether drivers would still need to complete the training if they had done so elsewhere.
83. One comment stated that several of the policy amendments were positive, with the exception in relation to the revocation of licences where a serious matter has arisen and which is being investigated. As explained to Members at the last meeting of this committee, the need to revoke, rather than suspend, licences has arisen as a result of case law which prohibits licences from being suspended pending the outcome of an investigation and subsequently revoked.
84. It is proposed that there would be a means by which licences could be quickly re-issued in cases where it is shown that any allegation was false that the driver is confirmed to be fit and proper to hold the licence.

Background Papers

Files in Environmental Services

Comments regarding the
proposed changes to Wycombe
District Council Hackney
Carriage and Private Hire
Licensing Policy

Compiled By

Mr. Zulfeqar Rahman

Hackney Carriage Trade Representative

Wycombe District Licensing Area

Wheelchair accessible vehicles

The general perception from some current wheelchair accessible drivers/ proprietors and Saloon car drivers/ Proprietors is that it should be stipulated in the taxi policy that wheelchair accessible hackney carriage should only be side loading as per the current policy.

It is proposed that the council should not accept rear-loading hackney carriage for the following reasons

- Within the Wycombe district area our ranks are designed for saloon and side loading vehicles, not rear loaders. A safe working space at the rear of the vehicle cannot be assured. To facilitate loading it is very likely and foreseeable that a vehicle would have to move off the rank and into the carriageway obstructing other road users and emergency vehicle with a risk of a collision.
- The limited space on the ranks (3.2 meters rear clearance required).
- The risk of bringing the wheelchair user into the road.
- There are bars between the rear seating and the designated wheelchair space in particularly in the Fiat Doblo so if there was an accident to the rear, there would be no way for the wheelchair user to exit.

Several authorities and National Organization's such as RADAR (Royal association for disability and rehabilitation), Scope, Disabled persons transport advisory committee and other bodies concerned with road safety have had policies advising against rear loading Wheelchair Vehicles being used as Taxis.

Their main concerns revolve around Wheelchair users being in the road when entering and exiting the vehicle and passengers being seated in the 'Crumple Zone' at the rear of the vehicle. They also highlight the scarce rank space and lack of alternative exits for wheelchair users in the event of an accident.

- Section 26 – 28 of the department of transports taxi and private hire vehicle best practice guidance relates to purpose built taxis this section includes the recommendations

The risk of rear loading taxis for disabled passengers.

- It is always safer to keep wheelchair users on the pavement then to put them in the road, particularly facing away from on coming traffic, which is necessary for rear loading vehicles.

- Taxi drivers may not be familiar with the lowering of wheelchair over a kerb and this can present dangers to passengers, passengers using a electric wheelchair may find it impossible to go down over a kerb at a rank but if access is from the pavement (Side Loading) none of these issues arise.
- The rear loading taxis leave the wheelchair passenger right at the back of the vehicle in the Rear Impact Zone.
- It is also important that wheelchair passengers have an alternative exit in the event of an accident. A side-loading vehicle will always offer the passenger the opportunity to exit from the other side in the event of an emergency. In the case of a rear-loading vehicle, where the rear doors or tailgate are damaged, this would be impossible.

To control the risks identified the simplest measure would be to license side loading vehicles.

Should the council decide to allow rear access as Hackney Carriage a formal risk assessment should be sought prior to decision being made in the interest of passenger / public safety.

Vehicle age limit

The general consensus amongst the trade is that existing wheelchair accessible vehicles should be licensed for the full 14 year term as when the drivers purchased the vehicles they invested their money taking into consideration that they will be allowed to run these vehicles for 14 years. The trade requests that new wheelchair accessible vehicles should be licensed for the term of 14 years if not at least run along side our neighbouring authority South Bucks that license wheelchair accessible vehicles up to 12 years.

Due to the increase of hackney carriage vehicles following de-regulation it is very difficult to gain the minimum wage. Which in turn shows that vehicles don't do excessive mileage therefore it would make sense to issue yearly licenses until the vehicle has reached 8 years of age.

Dacorm Borough Council whose drivers do similar annual mileage as WDC drivers get yearly licenses for up to 10 years.

Tinted windows

The members of the trade would like the council to relax the rule restricting the taxi drivers from having tinted windows we should be allowed to license vehicles, which have manufactures tints. On 22/10/2016 Slough Council implemented this policy. Following a survey conducted across 43 police forces that there is no identifiable information held by any police force in England and Wales to suggest that antiglare or tinted glass has ever contributed to the commission of any offence or alleged offence by anyone in a taxi.

Warnings

The trade as a whole is very aggrieved with an element of this policy. They state that once the warning time limit of three years has been reached it should be classed as spent, should a driver receive a warning within the three years it should be listed as a separate offence and not effect the time limit of the previous warning. Should a complaint not be substantiated then it is unfair to be kept on file and used against the driver in the future.

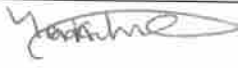








We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

	Name	Badge Number/ Number plate	Signature & Date
①	WASID ALI ASGHAR	BADGE J362 HC 1030	Wasid A. Asghar 12/12/16
②	MUHS MUNSAF	J364 HC1010	12/12/16 M. MUNSAF
③	MUHAMMAD NAHEEM	J360 HC1019	M. Naheem 12/12/16
④	M. Z. BASHIR	J336 HC017	M. Z. Bashir 12.12.16
⑤	MAHMUD HUSSAIN	J083 HC065	M. Hussain 12.12.16
⑥	BARRY WILDMAN	H014 HC.P. 04	Barry Wildman 12/12/16
⑦	TARIQ HUSSAIN	J.017 HC 052	T. Hussain 12-12-16
⑧	M. MALIK	J309 HC013	M. Malik 12/12/16
⑨	A. ASGHAR	HC010 HC19	A. Asghar 12/12/16
⑩	M. WASEEM	HC1032 J191	M. Waseem 12/12/2016
⑪	I. SADDIQUE	HC036 J270	I. Saddique 12/12/2016
⑫	Raja Anjil	HC019 J078	Raja Anjil 12/12/16





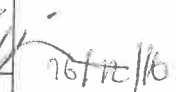





We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

	Name	Badge Number/ Number plate	Signature & Date
13	ANSAR MAHMOOD	J086 H/C 026	A. Mahmood 12/12/16
14	ALIANA DITTA	J269 H/C1015	A DITTA 12/12/16
15	AMJAD MAHMOOD	J155 Hc1017	Aajid 12/12/16
16	MOHAMMED IQBAL	J406 H058	Muhammad 12/12/16
17	MOHAMMED FIROZ	J096 Hc97	M. Firoz 13/14/16
18	ASJAD ALI	J332 Hc61	Asjad 13/12/16
19	TARIQ MAHMOOD	J468 H.c.1019	Tariq 13/12/16
20	QASIM IQBAL	J502 H015	Qasim 13/12/16
21	ASIM KHAN	J417 (H1058)	Asim 13/12
22	WASID ALI	J044 H.c1035	Wasid 13-12-16
23	SAJID MAHMOOD	J425 HC1016	Sajid 13-12-16
24	Mohammed Siddique	J235 H/C1022	M. Siddique 13-12-16

We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

	Name	Badge Number/ Number plate	Signature & Date
25	YASAR MAHMOOD	J5251 1037	 13/12/16
26	WASIM IQBAL	J511 H/c 1014	14/12/16 
27	KAMRAN MASEEB	J466 H/c 1057	14/12/16 
28	I. KHLAQ	J1214 H/c 1024	I. Ahmed 14/12/16
29	M. YASIN	J219 014	 - 14/12/16
30	A. MAHMOOD	J162/1038	 14/12
31	JAWED IQBAL	J234 H/c 022	 15/12/16
32	M. ASAIB	J105 - 065	M. Asad 15/12/16
33	A. RASHID	J052 - 1043	 15/12/16
34	A. YUNUS	H038 008	A. Yunus 15/12/16
35	A. FAROOQ	J. 505 - 021	 15/12/16
36	W. AKHTAR	J073 - 054	

We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

Name	Badge Number/ Number plate	Signature & Date
37) Ghulam Rasool	J 408 (006)	 15/12/16
38) NASIR AFZAL	J 461 1054	 15/12/16
39) IMRAN GHANI	J 453 HC 1040	 15/12/16
40) M. AYUUB	5134 HC 1023	M. AYUUB 15/12/16
41) T. MEHMOOD	J 412 HC 033	
42) M. HUSSA	J 0225 HC 1048 61 ABBEY Bldg	1048  16/12/16
43) M. HUSSA	J 140 HC 1045	1045  16/12
44) M. YOUNIS	H 022 HC 055	16-12-16 M. YOUNIS 
45) J. I. KAYANI	J 138 018	16/12/2016 
46) M. AKHTAR	J 204 H 009	16-12-2016 - M. Akhtar
47) SHAHNAZ SPIC	J 091 H 024	16-12-16 
48) ARSHAD M. AHMAD	J 075 1017	16.12.16 

We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

Name	Badge Number/ Number plate	Signature & Date
(49) Sajjad	J101 1052 J103	S. Hussain 16-12-16
(50) SALIM	J143 H045	H. Salim 17/12/16
(51) KHADKHA	H/C28 (Plate) BX62 MC002	B.M. Khadkha 17/12/16
(52) TALIB HUSSAIN	J065 H007	Talib Hussain 17/12
(53) Mohamed ABUO	J308 HC1055	M. AbuO 17/12
(54) ZAHMAN	J370 H/C057	Z. Zahman 17/12
(55) A. Mahmood	J018 HC1016	A. Mahmood 17/12
(56) M. ASLAM	J049 035	M. ASLAM 17/12
(57) RASOOL SHAH	J090 H/K 47	R. Shah 17/12.
(58) Ahsin Shah	J289 020	A. Shah 18/12
(59) M. ISHTIAQ	J508	M. Ishtiaq 18/12
(60) SABIR HUSSAIN	J125	S. Hussain 18/12

We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

Name	Badge Number/ Number plate	Signature & Date
61 SHAFIQ	J113 52	<i>[Signature]</i> 18/12/16
62 ZAHEER AHMED CHAUDHRY	J397 062	<i>[Signature]</i> 18/12/2016
63 MOHAMMED IQBAL	H042	<i>[Signature]</i> 18/12
64 MOHAMMAD RAZA	J087 H/c009	<i>[Signature]</i> 18/12
65 MOHD MAZID	J095 H/c060	<i>[Signature]</i> 19/12/16
66 ZAFAR ISBAL	J062 H-c 059	<i>[Signature]</i> 19/12/16
67 MAHAMMAD RAZA	J061 H/c 030	<i>[Signature]</i> 19/12/16
68 A. MAHMOOD	J016 J106 / 026	<i>[Signature]</i> 19/12/16
69 FAZAL KARIM	H/c037 J055	<i>[Signature]</i> 19/12/16
70 MOHAMMAD ASHRAF	J120 H/c 1005	<i>[Signature]</i> 19/12/16 H/c 1005

Taxi Licensing Policy Response from Trade

The following are areas on concern for the trade.

1) Reducing 8 Seat MPV vehicle capacity:

The trade feels there is no need to reduce the capacity. As asked in the meeting with the Licensing team, there have been no complaints from the public to the Council or the operator(s).

Although the leg room available to the seat in question is slightly less than others (Peugeot Expert/Scudo/Euro cab), the difference is a small amount. Unless the passenger is of a large build there is little chance of any hindrance. Considering the overwhelming number of these journeys is for a short distance, it is even less of an issue.

Licensing was unable at the time of the meeting to clarify which vehicles are suitable.

Considering the majority of these vehicles are VW Transport, Mercedes Vito or Eurocabs.

Licensing should thereof examine these vehicles in the first instance.

2) Tinted Windows:

The trades view on tinted windows is that this policy is unnecessary in 95% of the vehicles that are likely to be licensed. Unless the vehicle is fitted with aftermarket, very dark tints there is no issue. Licensing was asked if there is any known complaints/crime in relation to tints i.e. where tints played a contributing factor. Licensing was not aware of issues across the whole country.

It was discussed there is a real issue to obtaining aftermarket clear windows. Be this a brand new vehicle or nearly new vehicles. Tiger Taxis cited their own issue presently where they have paid for 10 Brand New Toyota Prius's . These vehicles are currently parked at the Toyota dealership as they do not meet the tint threshold set by WDC. Premier also has a similar issue. It is important to point out 99% of all vehicles for a number of years now, come with standard manufactured tinted glass.

Due to reasons listed above the trades view is that the tint policy needs to be removed. Or at the least those vehicles with very dark tints are restricted.

Other councils are in the process or have already removed their objections to tinted vehicles.

3) Age Limit:

Concern is related to the age reduction of Wheel Chair access vehicles from 14 Years to 10 Years old. WCV are very expensive to purchase. These vehicles in private hire trade particularly are primarily used for WC requirements. Licensing concerns are at the potential condition of these vehicles at 10 years old. However under current rules a vehicle can be refused a license if the condition is of a poor nature. Therefore there is no need to change the current rules. The current set of rules regarding this area is sufficient.

4) 72 Hour notification:

The trade feels the need to inform the council within 72 hours of 'any' offence is too stringent. Although certain offences (Murder/Sexual Assault) need to be informed quickly as

possible. Other minor offences i.e. SP30 (speeding) should be reported when convicted and not at the point of allegation. As allegations can be retracted before court/conviction.

5) Knowledge Test:

The current knowledge test is very difficult and too expansive in its coverage. Licensing stated there are typically 5 people in any test sitting. Only one person passes the test per sitting. This is pass rate of 20%. Which in itself shows the test is not fit for purpose. It was suggested by the trade that the test needs to be reduced in the number of questions, to approx. 15-20 questions (currently 60 questions, pass required mark is 48). Certain types of questions need to be removed i.e. which village is in the district. The trade also suggested a simplified version of rules and regulations be produced. As the current document is worded in legal terminology which many do not grasp.

6) Medical test:

The medical test should be allowed to be completed by a General Medical Council registered practitioner. This is the case when applying for a Bus or Lorry licence with VOSA. Some surgeries are charging nearly £200 for this examination. And have a wait time of up to 2 Months. Whilst the same examination can be done for £50.00, and an appointment available within a couple of days. An applicant can request a copy of his/her notes from their surgery and take them to a doctor who is conducting the examination. It is clear the applicants' surgery looks at the same notes when conducting the examination. Medical records are also available via the NHS computer network to any doctor who is provided with the applicants NHS number.

7) Driving standard test:

Driving Standard Authority no longer run the test for Taxis. The trade feels these tests were unnecessary to begin with, as they only tested general driving, the same as when passing the normal driving test.

8) Bus Lane Use:

Current rules state only taxis with a large sign can use bus lanes. Any taxi with a small sign is not allowed to use bus lanes. Trades view on this is that all taxis and private hire vehicle be permitted to use bus lanes. Although WDC does not have the power to determine who uses the bus lane (Bucks County Council has jurisdiction), WDC should lobby Bucks CC for this change of use.

9) Door Stickers:

Current door stickers are of a poor quality and disintegrate. With the cost met by the operator. Considering majority of operators have their own company stickers on the same vehicle. Is there a need for these stickers? The benefits of having stickers are questionable in the modern day. Where customers are sent text messages of the vehicle (Make Model Reg Colour). This allows customers to have peace of mind that they are getting into the correct vehicle. In any case the quality of the stickers needs to be improved and any further costs as a result of poor quality need to be met by the authority.

10) Executive Plate:

In order to obtain an executive plate an operator needs to provide confirmation of work. This has to be in written form from the client(s) on headed paper. This process has to be repeated each time any extra licences are required. Also only account work can be carried out in these vehicles. No cash paying customer can use executive vehicles. This seems absurd as there are customers who wish to make sure of executive cars. There are vehicles with executive plates from outside of WDC jurisdiction operating in Wycombe District. Clearly operators/customers are not happy with the current regulation. Thus them operating/using out of area vehicles.

11) Change of vehicle/variation of licence

Currently if a vehicle licence has 11 months to run, and an operator needs to replace the vehicle. The operator is required to pay an admin charge and the licence is transferred to the replacement vehicle. However recently licensing has changed the rule (without consultation with the trade) where the operator is only reimbursed £30. And is expected to submit for new 12 month licence. Currently the cost of annual licence is £242.00.

Any remaining time (number of months) of the licence needs to be refunded to the operator accordingly or deducted from the new licence.

12) CCTV/Audio recording

Proposals to prohibit voice recording unless in distress are unworkable. As it is not reasonable to assume drivers will have time to turn on sound recording in the event of an attack/abuse. The licensing department cite the Information Commissioners ruling. The ICO guidelines allow the use of sound recording in certain circumstances. Taxi trade surely would fall into this category. Where drivers are expected and indeed pickup rowdy/drank and at time dangerous individuals. This recording would of course give the driver a greater degree of assurance that if something untoward does take place, there is clear evidence available to law enforcement. ICO guidelines require a clear sign stating video and sound recording are in operation. These signs would of course be displayed in all vehicles which have this facility.

13) Complaints Procedure

It is unfair to all licensed drivers that any complaint without proof is held on file. This system is open to abuse where a person can write to the council under multiple names or even ask friends etc. to write. Even single complaints from members of the public can be sinister i.e. there is no real complaint but could be made up if the person perceives the licensed driver was not conducting themselves in a manner contrary to what they believe. Any complaints need to be investigated on their own individual basis.

Drivers' current perception is that they are guilty at the point of the complaint and need to prove themselves innocent. This flies in the face of any democracy where an individual is

innocent until proven guilty. In any outcome currently, all complaints are held on file and used against the driver in further complaints.

14) Conduct certificate from abroad

Requesting a person who spends 3 months out of the UK to provide a character reference from the host country. This is an unreasonable request. Obtaining anything from any embassy/police station is at their discretion, and if they are to provide one, they are under no time obligation. Furthermore if the licensee has spent time in multiples countries this process is very troublesome and time consuming. And can result in loss of employment for the driver. We are not aware of any similar rule in any industry in the UK.

15) Advertising

Any licensed vehicle should be allowed advertising. Be this inside the vehicle i.e. visual display or outside in the form of stickers (rear bumper, windscreen edge, panels). We envisage the majority of adverting will be for local businesses, which obviously will have a direct positive effect on the District.

The council needs to be made aware there has been a massive influx of out of district licensed taxis/phv into Wycombe District. The trade believe this is due directly to the strict policy of governance of the taxi/phv trade. Nearly all of the points listed above are not applicable to these out of area vehicles. The number of these vehicles is likely to grow. WDC officers have no jurisdiction over these drivers of their vehicles.

The trade would like to request an opportunity to discuss/present their concerns directly to the licensing committee before it is discussed in the committee meeting.

Agenda Item 4. appendix C

In my opinion the proposed 8 seater seat requirement changes are unfair and will marginalise smaller companies in what is already a trade dominated by a handful of companies. The proposal states “the front seat is too narrow, leg room is insufficient and the passenger would be required to sit at very close proximity to the driver”. The width of the seat and leg space are in line with what you will experience in any normal saloon car. Sitting in close proximity to the driver is not a problem when you consider all drivers have gone through a severe scrutiny process to gain a licence from the council and have been found to be “fit and proper” person to hold a taxi licence. All vehicles on UK roads have to go thorough strict UK & EU regulation and compliance before they are certified as road worthy so for the proposal to suggest 8 seater vehicles are inappropriate to carry 8 passengers are short sighted and in the surface unfounded. What data does the council have to support their reasoning? How many customer complaints have there been on this issue? The impact on small companies will be in £000’s and will cause the competitive taxi market to be further dominated by several big firms and will cause some firms to stop trading. Vehicles used under the Public Service Vehicle (PSV) operator’s licence issued by the Traffic Commissioner have no such restrictions. It is permissible under this type of licence to use the exact same vehicles without any restrictions and I am not aware of any neighbouring authorises having such restrictions. The proposal is only considering the experience of the customer and needs to look at the impact on operators and drivers.

To whom it May Concern,

I would like to make suggestion's towards the council's current Hackney Carriage and Private hire licensing policy.

Firstly, i think it is unfair as Hackney carriage vehicles are allowed to use tariff 2 after 6pm, whereas private hire vehicles are not able to do this. Therefore, to make it fairer i think one price policy should be implemented for all taxi drivers regardless of whether they are a hackney carriage or a private hire. In regards to pricing, I think that the current prices such as airport prices in and around high wycombe are very old prices going back at least 20 years. However, given the current economic climate and inflation, I think that the airport prices should be increased by at least £20. Furthermore to hackney carriage vehicles, hardly any wheelchair users use the disabled access vehicles off the rank, therefor, we should have more saloon and MPV vehicles instead of these big disabled accessible vehicles. The council should also, review the policy on hackney carriage vehicles and the disabled access should be made accessible from the rear of the view and not the side.

I think that the council should have a no stickers policy as many neighboring borough's such as Maidenhead, Windsor and Slough do not have stickers on the doors. On this note, i think that the council should also, take into consideration the size of the licensing plate as it is far too big in comparison with Maidenhead's licensing plate for the vehicles. This makes the cars appear smarter and gives a good impression of the district. To overcome the confusion of which car is for a particular customer, private hire firms should update their software systems so that the customer receives a text message of the vehicle registration mark(VRM) and knows which taxi to get into.

The knowledge test in high wycombe needs to be made more easier as it is a lot harder for new applicants to pass. In London, majority of black cab drivers still use Satnav's therefor, it defeats the purpose of a knowledge test if we have technology that will enable and assist us with our everyday lives. Also, passing the driving test is inappropriate as the applicant will already have held a valid driving licence for a minimum of 3 years, therefor, in my humble opinion i think this is a complete waste of time and money.

Thanks you for considering my views. Please do not hesitate to contact me.

Kind regards

I am in favour of issue of license at the age of 5 and length of 10 years instead of 4 and 8. It will make life a bit easier. Tnx

I am in favour of amendment that license should be issued at 5 years of age and 10 years of length instead of 4 years and 8 years.

I read your taxi policy in that you saying you are going reduce Taxi WAV limit down to 10 years. I believe this is not fair for people like my self as a new car cost £30000 for your requirements so we can't afford that much money to buy new car.

if you look in to the PCO LICENCE POLICY there is limit for black cab, which is 22 Years, so i request you to keep the same policy for old vehicles and apply the new rules to the new vehicles when they have completed their 14 year limits.

If you allow us to put vehicles with rear wheelchair access then you can reduce age limit to 10 years as they are like a normal cars as they are easy for customer to get in and out of.

I plead with you to think about drivers like myself who cannot afford to repay before you apply these new regulations.

Increasing the age of Taxi/Private Hire cars from 8 to 10 years to drive. Companies will be able to driver two more years and this will save money on longer run, There is a lot of competition and its hard to earn money. Also the age of a car from 4 to 5 years when its first licensed is a good option because our neighbouring councils have already these policies in place and this is very attractive for lots of company owners to settle in this area. I personally know lot of drivers who have completely moved from Wycombe Council to South Bucks and Henley Council, because its far more money saving option for companies and drivers. I know also drivers who are not licensed by Wycombe council but do they do still work in High Wycombe with neighbouring councils Plates and Badges. The point of having to Mot your licensed car every 6 months after 6 years doesn't make any sense because if your car is broken you would repair it and then drive. All cars in UK they are Mot every 1year so this is safe also according to the government, Even in South bucks Council they have every year MOT and Renewal of the license. Kind Regards,

To

The Taxi Licensing Officer

Dear officer

I read your taxi policy in that you saying you are gonna reduce Taxi WAV limit down to 10 years. It's not fair with us .new car cost £30000 for your requirement.so we can't offered that much money to buy new car .if you look inPCO LICENCE POLICY there is limit for black cab is 22 Years.so i request you to keep the same policy for old vehicles and apply on new rules to new vehicles when these are complete their 14 year limits.and when drivers start putting new vehicles.then these new rules apply.

If you allow us to put vehicles with rear wheelchair access then you can reduce age limit to 10years .they are like a normal car .They are easy for customer to get in & out.so again I request you to think about for the rear wheelchair access vehicles.i hope you will rethink about us before you apply these new regulations.I got a house and need to pay mortgage for my house . So I can't offered that much money to spend on car which is lost 10 years.£30000 is a lot of money. if you change into rear wheelchair access then it's fine.Because they are like normal car easy to buy.I hope you must rethink about this meter and give us choice for saloon or rear wheelchair access vehicles.

Your sincerely

Further to my previous comments I feel that all wheelchair accessible vehicles should be side loading. 1. It would not be user friendly or very safe to load a wheelchair from the rear on the high street or any off the ranks as you would be causing a obstruction on the main highway as all the ranks have passing traffic they are not in a pedestrianised area. There are other public transport and emergency vehicles using these areas and it would cause traffic chaos 2. If you are flagged down in a busy road i.e. Marlow high street again you would have to go in the main road whilst if it is a side loading vehicle you can load from the kerb and cause no obstruction. 3. Before rear loading accessible vehicles are authorised as Hackney carriage vehicles I feel a risk assessment should be carried out and it should be compulsory for drivers whilst plying for hire to wear reflective jackets so they can be clearly seen when they are loading a wheelchair in the interest of there safety and there passenger safety and overall public safety of Wycombe district council residents. A lot of people will be pushing for wycombe district council to allow for rear loading vehicles to be authorised this is due to the price element because they are 1800 pounds cheaper then side loading vehicles again the people are not looking at a broader picture of their and public safety which is of paramount importance . I feel I owe it to the community of Wycombe district council area as it would be very upsetting to read in the local gazette that some body has driven into the rear of a taxi whilst being loaded with a wheelchair due to the driver not being seen

I fully agree with the reduction of the current age limit of the wheelchair accessible vehicles as some of them are very tatty and they are being used as normal rank vehicles (considering some of them have been converted from vans) so they are doing the same mileage as saloon cars I feel there should be a grace period of 6 months for the vehicles which have reached the age limit of 10 years on the implementation of the new policy. To replace these vehicles will cost an average of 6000 for a 5 year old accessible vehicles with a decent mileage of 60,000 which I can't see causing any one financial hardship considering they will be able to license these vehicles for up to 10 years. I feel that the new policy will be superb for the trade and is very clear and to the point and user friendly credit must be given to the team members who have put this policy together to bring wycombe district council in line with other authorities people always find change difficult but this new policy is workable I've been in the trade for over 10 years and implementation of this policy would be good value for money. Licensing officers should be given more authority so they can make decisions rather than having to refer cases which isn't very cost effective and also time consuming.

To

The Taxi Licensing Officer

Dear officer

I read your taxi policy in that you saying you are gonna reduce Taxi WAV limit down to 10 years. It's not fair with drivers.new car cost £350000 for your requirement.so we can't offered that much money to buy new car .i request you to keep the same policy for old vehicles and apply on new rules to new vehicles when these are complete their limits.and drivers start putting new vehicles.then these new rules apply.

If you allow us to put vehicles with rear wheelchair access then you can reduce age limit to 10years .they are like a normal car cost less than side access vehicles . They are easy for customer to get in . In side access is hard for old people to get in .so again I request you to think about for the rear wheelchair access vehicles.i hope you will rethink about us before you apply these new regulations.like me I got four kids and need to pay rent for my house . So I can't offered that much money to spend on car which is lost 10years .I'm working for Arrows when I take the current WAV HACKNEY to customers I think about 50 customers are refused to get in .they saying its to big to high can't get in this and that.too many times I waited to long in high street when customer comes and say the same thing.if you change into rear wheelchair access then customers have no issues. Coz they are like normal car I hope you must rethink about these issues.

Your sincerely

Dear Sir/Madam,

I am writing this due to the fact that I and many others do not agree with the new policy that you are implanting and suggest that this change is not made as it is not going to benefit many people, additionally just is a hassle to repeatedly do a test will be not only inconvenient but time consuming and I personally see no reason in doing so. I hope you can get back to me as soon as and am awaiting on your response.

Eye tests should be repeated every 12 months and more often for the over 60s these should be done at an optician not at a GP surgery.

Licensing Head Afternoon, As to my recent phone queries there have been few questions from myself and some of our employees regarding the new policy. Q1 who will provide the CSE and how will the drivers be examined the what procedures will be taken. If the drivers have already done similar training for Bucks county council will that also be taken to consideration If the drivers have done NVQ for taxi Will the council rather than leasing the DSA test to other private company consider a Pass Plus as an option which many other council are currently using. We all agree that the public safety is important but there have been growing number of taxis from other boroughs working in High Wycombe which is not a problem but speaking to many drivers who drive these taxis are drivers who have not been able to pass the local knowledge test due to the questions being long and difficult and no training or material being given. I would recommend that the council should be more lenient in its stance with Knowledge test and maybe reduce the number of questions being asked. If this carries on the local trade will have no choice but to recruit from other boroughs and the council will lose huge chunks of money which was coming in to the council from the drivers and companies. Displaying Stickers on Doors if the car is plated in another borough then we have to look in their advisement policy. These are just few point in the policy that we feel need to be looked in to and amended before it can be presented before the trade and general discussion.

After reading the draft Hackney carriage and private hire licensing policy I noticed several positive amendments to the policy and I agree to all but one; the revocation of licence. This proposal states that a driver's licence can be immediately revoked if they are accused of an inappropriate behaviour towards the passenger. However, I believe that a driver's license should not be revoked until evidence and with proper witnesses is shown to support their story. It is unjustifiable if a driver's licence is revoked without evidence because it could be a false allegation and this can negatively affect someone's life.

