

APPENDIX D

To Whom it may concern

We are not currently licensed by Three Rivers but are in the process of finding a suitable operating centre within the borough and will soon be applying for an operators license.

As the proposal will effect our operation in the future i hope my concerns are still valued.

4.3 All newly licensed private hire vehicles must, as a minimum, be categorised as M1 and meet Euro 5 standards for emissions.

We are a Minibus Company providing school transport for SEN students to and from schools. A minibus by definition is classed as M2 (some minibuses even start life as panel vans N1) however seats are removed to accommodate a maximum of 8 passengers and some vehicles are completely converted to make them Wheelchair accessible.

All our vehicles have undergone VOSA certification or have a Certificate of Conformity proving they are professionally converted to a safe level expected for passenger carrying vehicles.

It would be my suggestion that M2 or N1 vehicle are eligible for licensing on the provision the vehicles have one of the following as evidence they are fit and safe for carrying passengers,

VIVA - Voluntary Individual Vehicle Approval

COIF - Certificate of Initial Fitness

COC - Certificate of Conformity

(There may be other forms of certification but these are what we currently use.)

Whilst i agree to the requirement for vehicles to meet Euro 5 emissions standards, i would suggest this only applies to vehicles coming in for first time licensing. Vehicles which already hold a three rivers license should continue to be licensed on the ground they meet the requirement for evidence of safety as mentioned above.

4.6 In line with research carried out by The Royal Society for the Prevention of Accidents the tyre depth of each tyre should not be less than 3mm in depth.

This seems quite extreme, whilst it is in no ones interest to let tyres run down to the tread limit of 1.6 mm, 3 mm of tread has considerable life left in them, i feel 2mm would be sufficient as this would allow sufficient use of the tyres life and stop them from being run down to the legal limit.

4.8 The licence holder shall not allow the mechanical and structural specification of the Private Hire Vehicle to be varied without the written consent of the Council.

Our vehicles are modified to accept wheelchairs which incorporates the installation of wheelchair restraints and seating systems, all of which are then tested and issued with one of the certificates listed above. Assuming the license holder has the required evidence the modifications are fit for use then i would assume the council would find the modifications acceptable.

1.5. When a vehicle is licensed for private hire purposes it can only be used as a private hire vehicle and must be driven only by the holder of a current Three Rivers District Council Private Hire Licence, clearly displayed on his/her person when driving such vehicle. No other person is permitted to drive the licensed vehicle at any time.

Whilst this does not directly effect our operation, i would imagine it would be very hard for a private hire driver to maintain two vehicles with the ever increasing costs (insurance, road tax, maintenance etc) in what is an ever more competitive market.

Thankyou for taking the time to read my representation regarding the proposal and look forward to receiving any feedback.

Kind regards

[REDACTED]
Cruise Minibuses Ltd
[REDACTED]
[REDACTED]

There are lots of three rivers drivers work in hemel which I think is wrong they should
only work where they licensed to work

[REDACTED]
Can you please clarify section 4

4.3 all newly licensed private hire vehicles must be euro 5 emissions

Does this mean that my vehicle will no longer be able to have its plate renewed, like i
have done for the last 4 years or does this just mean any new driver applying for a
vehicle license.

Also the section whereby you state only a licenced private hire driver can drive my
car , what happens when my vehicle is in a repair garage . Are the mechanics not
allowed to drive my vehicle

Also with having to display the outside plates at all times even if not actually working
or the vehicle is parked up is, actually is an invitation to thieves to break into the

vehicle searching for cash, pdas, 2 way radios.

Would it not be better to state that when not actually at work, the rear plate can be removed. It has been noted countrywide that private hire vehicles with plates displayed when parked at home addresses are being targeted by thieves, as easy pickings

Yours

[REDACTED]

[REDACTED]

Dear Three rivers licensing

We are writing to you in regards to the consultation On 20th May. We would like to put forward a few concerns which have been noticed by the majority of people within the trade over a substantial period of time.

1. The first issue which we have is three rivers licenced vehicles Soley working in Dacourm . Which is affecting all aspects of the trade within Dacourm
2. Secondly we have rogue operators who have no intention of working by the rulers set by licensing. The concerns are that the operators are not working in three rivers district and are in fact soley operating in Dacourm and using three rivers drivers to strickly work in Dacourm. These operators are encouraging drivers to break set rulers which all others have to follow.

These concerns have been raised to us by all of the trade in Dacourm over a long time and as the association we ask you to please take these concerns as important facts. So that maybe something can be done to reinforce the rulers which make it clear that licensed vehicles and operators work within their own district .

Many thanks [REDACTED]

chairman of the dacourm taxi association

[REDACTED]

Hi the following people like to object to the NEW changes you are proposing for:

- [Draft TRDC Private Hire Driver Conditions for consultation](#)
- [Draft TRDC Private Hire Vehicle Conditions for consultation](#)
- [Draft TRDC Private Hire Operator Conditions for consultation](#)

We feel all the new changes which you are fully aware of what they are not required and unnecessary.

We feel the new changes are unfair and would make it much harder for us to obtain private hire licence and operator licence. We are all willing to challenge this if required. Please can we all be kept in the loop in what the next steps are. Please use this email as point of contact for any future communication.

The current licences and condition for private hire and operator licence are fine and do not require any changes what so ever !

The following is objection to all NEW changes we shall all follow this up and be expected to be invited to a proper consultation .Please note 95% of us had no notification very disappointing as we all hold licences with three rivers.

The only way we come to lean about the above was we hold another operator licence in another area where the chairman highlighted the change three rivers are proposing make which come to shock to all below.

Please add the following people on your OBJECTION list and take this email as formal notification.

[Redacted list of names]

[REDACTED]

Please note a petition has been set up which will be sign by all above and many more candidate which will be handed in due cause

We objected to the proposed changes strongly and we all will unite and stand up until our voice are heard. all the above have given permission to send this email and object to all NEW changes.

This email will be kept for our records as proof that three rivers have been sent this email to formally recorded our objection to all the new changes proposed.

Thank you