

Appendix 3: Consultation response(s)

Dear Licencing Team,

Thank you very much for your kind opportunity to speak about the new changes to its Hackney Carriage and Private Hire Policy 2019.

Yes I have some observations and comments on your new changes.

Firstly: Local Government (Miscellaneous Provisions) Act 1976 ("The 1976 Act")

Clause 5. Dual plating Any vehicle that is licensed with another local authority as a hackney carriage or private hire vehicle cannot be licensed by the Council.

This option basically reduces the opportunity for the private hire drivers. After Covid Pandemic and lockdown, most of the operators lost their customers and moved the business to online base operators like Uber and Bolt. All the operators don't bother whether they are losing their business or not. They only care about their weekly fees from us. But we are struggling to continue.

*The other councils surrounding the Three Rivers District Council are giving permission to their drivers to operate with Uber and Bolt with their local license. Most customers mostly depend on Uber and Bolt now. The situation made it more difficult to get enough customers to cover our cost. **My observation is to give permission to Uber/Bolt to operate with Three Rivers District Council Private Hire Taxi License holders or restrict the TFL/Uber/Bolt operation within the council and surrounding areas (councils).***

16. Standards for conditions of appearance of vehicles. The vehicle must comply with the following:-

Glazing: All vehicles will be tested with a light meter. Any vehicle with a reading lower than the following will not be licensed. Front Windscreen 75%, Front Side Windows 70%, All other Windows 30%. The lower the number the darker the tint. There may be exemptions to allow factory fitted tinted windows in exceptional circumstances for example vehicles working under an applied exemption whereby the vehicle is used for Corporate, executive or Chauffer hire service'. All vehicles that are used for schools contracts must not be fitted with tinted windows which are darker than required standards. Vehicles that are found to have such tints will be removed from service immediately and the tints must be replaced with more appropriate glazing at the cost to owner of the vehicle.

The change of tinted window rule is totally unprofessional and fully unethical. Every driver got their taxi license after going through all your procedures. The reason you want to change the rule is not appropriate at all in this case. As a council private hire taxi driver, I am feeling shame. At least we deserve some respect and trust. However, if there is any dishonesty among us, imposing new rules cannot solve the issue.

Technically it is not appropriate to change the factory fitted tinted glass of any vehicle. All vehicle companies are complying with the UK Govt guidelines before they are imported or manufactured. If we want to change any parts of a company fitted vehicle, ultimately, every car is losing the warranty. Not only that insurance premium will increase to modify the car. Overall, we need to pay the cost of changing all tinted windows. Seriously, do you think it is logical?

You must monitor that the existing rules are executing properly or not. Any School Run contract should not be given to subcontract. But currently all operators distribute the "School Run" contracts to different operators/drivers/different council private hire drivers. If you prevent this stage and ensure one contract-one operator-one taxi-one driver, then it is more riskless and more trustworthy.

There are more other alternative options to prevent any incident, like install an authorized camera, School runner special photographic ID with Car Registration no, frequently check and follow up.

Definitely I am disagreeing with this change and hope you will understand this change is not appropriate and also consider our concern.

Finally thank you for giving the opportunity to express our view of your new changes.

Thank you.