

*Holmes Chapel  
Cheshire  
CW4 7BE*

18<sup>th</sup> February 2009

**Vehicle Conditions:**

To Whom It May Concern:

We are writing following your request for comments on the new Vehicle conditions.

We run a small, very respectable private hire firm in Holmes Chapel, we have three vehicles including a 8 seater minibus, 6 seater people carrier, and a car, and have served the community of Holmes Chapel for 10 years our vehicles are of a high standard and we have always put the success of our business down to the smartness of our vehicles these new vehicle conditions seem to be far too extreme, under the new Cheshire East conditions none of our vehicles will meet your criteria. All our vehicles have always passed the vehicle inspections under Congleton borough council, and dramatically changing them this much is going to affect our business. Our customers book us for our respectable cars and our reputation your conditions are trying to turn us into city taxis, we live in a small village with a small population and limited work. These conditions are totally unfair.

Our first concern is this aluminium box around the gas tank, this seems to be a very loosely put, does this apply to gas tanks outside the vehicle or inside the vehicle, concerned about this I telephoned the L.P.G.A who regulates L.P.G conversions they have never heard of this aluminium box nether has the installer we use in Manchester who informed me that he has converted hundreds of Taxis in Manchester area and is a mystery to him as well as us. We have had L.P.G vehicles for over seven years and have always produced an L.P.G.A certicate for all of our vehicles and in the eyes of the law and the insurance companies have always been sufficient. We were also advised that modifying our L.P.G conversions from the way it was installed would in fact be illegal so maybe this matter needs to be made clearer. Also the new rules on tinted windows seem

unfair; most modern vehicles have tinted glass which meet the requirements of the law. We feel that the regulations is going to make it virtually impossible to source new vehicles in the future, we will have to pick vehicles which have the right glass not if the vehicle is suited for the job.

I am a female taxi driver and have held a private hire badge for 19 years, in my experience it's us as private hire drivers that need protecting from the general public outside the vehicle, as car crime and car jacking are on the increase.

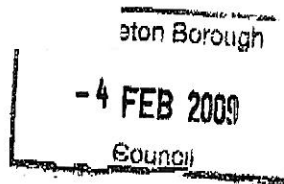
We are private hire we have to keep records of our fares, it seems to me that we are guilty of some thing we haven't done again. Me as a female driver my tinted glass in my vehicles offer me protection from unwanted attention from the general public, as these don't seem to take our safety into consideration. I don't think this is fair and you are treating private hire taxis as if we are hackney which we are not. We agree that blacked out windows maybe to extreme, but the 70% light transmission is going to make it impossible to source suitable cars and if they are manufactured with the tinted glass this should be allowed so maybe this should be reduced to 50% also our views on window tint film this can be more benefit to the passengers, window tint film can reduce the heat build up in a mini bus by 40%, as you are aware most mini buses don't have opening windows in the rear this can get very hot and uncomfortable in summer, also did you know 30,000 car accidents per year are side impact collisions, 40% of multiple vehicle accidents are side impacts.

Broken window glass is a major cause of eye & facial injury. Having a light window tint film can stop flying glass and in an 8 seater mini bus, which have a lot of glass close to the passengers in the rear is more of a safety feature, again maybe reducing it to 50% light transmission would be fairer.

It's not against the law to have tinted glass in 16 seater mini buses and coaches which are also carry the general public, so we do not agree with this condition. Which brings us on to the advanced booking only signs that must be affixed to the paint work we don't agree with this we know we are private Hire; we have never picked anyone up of the street and never would. We don't see what difference this is going to make if operators are going to break the rules then they will, all this is going to do is devalue our vehicles because the paint work is damaged by the adhesive, and in addition why cant we affix them to the glass which where most people look, or better still not having them. We have taxi plates affix to all vehicles to say we are a licensed taxi so we disagree with this condition.

Mr & M





2<sup>nd</sup> February 2009

Dear Sir / Madam

I am in receipt of the new licensing conditions proposed by Cheshire East Council starting April 2009. I am currently a private hire driver with my own operators licence working under Crewe & Nantwich Borough Council, I run my own business Airport Express Cheshire Ltd transferring passengers to and from all UK airports, I do not do " Normal " taxi jobs at all. I have various contracts with Travel Agencies and also various Golf Clubs, these new conditions will cause me an issue with the "no tow bars fitted "condition on the new proposal, as this will seriously have an effect on my business and affect my current contracts. I have always had and still do have a vehicle with a tow bar simply to transport excess luggage passengers may have also golf clubs and skies etc. My vehicles have always passed council inspections with a tow bar on them, and hopefully this will continue under "Grandfather Rights ". I have a commercially built trailer 6 x 4 with a solid plastic hydraulic lid.

With being a self employed " one man band " business I also use my vehicle for private use we have a caravan and like to go on camping holidays, losing my tow bar here will also cause me a lot of concern.

I hope you will review my points raised, and hopefully they can be readdressed?

If things do stay the same when my licence is due for renewal I would have to seriously consider my options, as these conditions will seriously effect my business, I am aware that currently Vale Royal, Chester and Wrexham do not have any restrictions on tow bars. I look forward to hearing from you

**licensing****From:****To:****Cc:****Subject:****Attachment**

Sent: Wed 21/01/2009 12:03

Dear Mr

I write regarding the new fees and conditions which are to be introduced under the new Cheshire East Council.

Firstly I would like to know where these so called powers that-be have been for the last year.

The country is suffering the biggest recession/depression since the 1920's. Everyday we are hearing about company's struggling and indeed going bankrupt. We are hearing every day about redundancies as more and more company's go to the wall.

We in our area are not immune from it. There are a lot of company's laying people off and making them redundant. They are also making cut-backs in all areas.

Our trade is not exempt from this hostile environment.

Our business turnover is down by 30-40% at the moment.

I have had to finish a driver before Christmas and I have a driver on short-time depending on the work commitment each day. This week my full-time driver will be laid off 2 full days. We have been in business since 1995 as you know and are one of the oldest if not the oldest established private hire/taxis company in Sandbach. I have never known times like it.

I just cannot believe the new fees they propose to charge from 1st April.

Just taking the PHV Licence @ £300.00 is just over a 30% increase. That is not including the other fees.

I am very unhappy with some of the new conditions too.

I do agree with many of the conditions. They are very much in-line with the existing conditions already operated by Congleton B.C.

A few examples I am not happy with are;

a) 2 vehicle tests a year for 7 years old and above.

Why 2? Why not just 1 as existing conditions. We already have an MOT-so that's 3 tests a year.

b) Tow-bars not allowed.

I have a tow-bar on 1 of my vehicles which is used when taking Skiing/Golf party's to the airport. This is a major part of my business.

c) High Visibility Jackets/Warning triangles.

Why? All these items are an extra cost in this current economic climate. There is no legislation throughout the country for the millions of cars to have these.

d) Advanced bookings only.

Again Why? Everyone knows what private hire vehicles mean. The writing on the doors look very un-sightly, it looks like nobby's car. Again it is also the cost in the current climate when we are all trying to keep our heads above the water.

These are just some of the grievances I have with the new proposed fees & conditions.

It's all very well bringing them in when the economy is running normally.

To even think about such an extra burden when we are all in the middle of a crisis at the moment is absolutely reckless and thoughtless by the new council.

I have written to Rt.Hon. Ann Winterton MP regarding this matter and she has promised to look into this for me.

I do think that the current licensing department at Congleton B.C. should be supporting its own Private hire/Taxi's regarding these new issues in the Congleton Borough.

I confirm that I will be attending the meeting on Thursday 19th Feb.09 @2.00pm along with many other very angry operators.



20/01/08

Dear Tony,

I write with reference to our telephone conversation, regarding the Private Hire Taxi Proposals for Cheshire East.

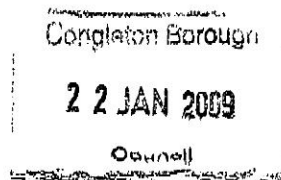
In particular the need to carry First Aid Kits as a condition of Licensing, There is Nowhere in the proposals any mention of Training to administer First Aid, therefore Leaving all drivers licensed by Cheshire East in a predicament.

The inference is if we are instructed to carry First Aid Kits then we are expected to use Them an inference made by Cheshire East Council, rendering both the Taxi Company Liable and possibly Cheshire East should something go wrong after First Aid has been Administered. I trust that you will clarify this point.

Yours Sincerely

19<sup>th</sup> January 2009

Licensing Section  
C/o Congleton Borough Council  
Westfields  
Middlewich Road  
Sandbach  
CW11 1HZ



Dear Sir/Madam,

**Re: Proposed Driver Conditions Private Hire Vehicles**

Having read through the "Proposed" conditions and noted therein, some of the items which I feel will have an adverse affect on my business as a private hire license holder.

**Item 1.6 Seat Belt configuration;** whilst I fully concur and appreciate the use of seat belts at all times, this clause needs some reclassification especially for MPV users. My vehicle has been deemed fit for use by ROSPA, however, the middle seat has only a lap belt and there is no alternative way of fitting any other form of safety device, could this be clarified please, otherwise I will lose the use of 1 seat from my vehicle?

**Item 2.5 the vehicle shall not be fitted with a tow bar;** I feel this item should be sub-divided into category of vehicles. Whilst I appreciate that some cars could potentially tow an incorrect weight I feel it should be noted that MPV/Mini Bus's etc due to the passenger ratio should be allowed to have towing facilities to accommodate their Customers' luggage.

I will explain my above comment, my vehicle will seat 6 people, if at capacity I do not have room for 6 suitcases or bags, currently I have the offer of work from a local golf club and also Clients to the airport with skiing equipment. To be able to have these items securely and safely in a trailer will enable me to gain this work and will not compromise or endanger the passengers at any time, I hope this item will be reclassified in favour?

**Item 4.2 Vehicles over 7 years testing;** whilst I have no problem with the testing of vehicles as I welcome the opportunity to safe guard the public's well being in line with the normal M.O.T would it not be better served as a yearly test at an appropriate and affordable rate.

Continued .....

**Continuation 2 – Licensing Dept – “Proposals Private Hire Vehicles 19.1.2009**

**Item 7.2 Signage;** I will comply with the request to have “Advanced Bookings only” placed on my vehicle but the height of letters and placement could cause problems, especially for visibility. Could it not be said that if this wording is included in the overall signage then it is in compliance? Also to note how this would affect the already licensed and signed vehicles registered now, as it is a Council “proposed” request would the Council be prepared to refund the costs of any new /amended signs necessary for licensed vehicles?

**Item 7.5 Advertising;** Could this item be clarified please? Does this advertising constitute advertising for other companies or products or does it cover advertising your own business use, i.e. Airport Runs, Business Contracts etc?

On all other items of the document I am otherwise in compliance and agreement thereof.

I look forward to your comments of clarification and the opportunity for adjustment.

Yours faithfully,

Proprietor

Licensing Section  
C/o Crewe & Nantwich Borough Council  
Municipal Buildings  
Earle Street  
Crewe, CW1 2BJ.

2<sup>nd</sup> February 2009

To whoever it may concern

Dear Sir/Madam,

Having received and read your several letters regarding proposed changes to Private Hire fees and conditions and having responded critically to the Sandbach office on the fees issue, I now wish to comment, equally critically on the subject of conditions.

My Son and I have been operating an executive airport transfer business on a Congleton BC Private Hire licence for 14+ years. We have catered for the needs of some private individuals but, in the main, for senior management personnel (including CEO's and Managing Directors), of several large companies in North Staffordshire and South Cheshire. Our services have been very much appreciated and would be sadly missed by our loyal customers should the latest proposals put us out of business.

Should the proposals for fees and conditions be implemented this is a real possibility.

Referring to "Private Hire Vehicle License Conditions" :-

Para. 2.5 In a vehicle licensed to carry 6 passengers on an airport transfer journey with 6 senior executives plus luggage. would it be appropriate to ask the passengers to carry their cases on their knees?. Certainly not for Autocruise !! A simple solution would appear to be to use a trailer - an arrangement employed by many operators countrywide but apparently not permitted by our new Cheshire East Council.

The use of a roof rack allows luggage to get wet in inclement weather and, as with roof pods, the task of lifting heavy cases onto the roof of even the smallest car would be frowned upon by the Health and Safety Executive.

Para. 7.1 In the case of executive transfer work the placing of prominent signage, permanently fixed or otherwise, should be avoided in the interest of discretion. Operators displaying such signs are unlikely to be selected to undertake the work of major companies.

Furthermore, operators wishing to maintain their vehicles in pristine condition would be reluctant to disfigure the vehicle paintwork by fixing permanent signs.

Para. 10 I note the inclusion of the "Special Condition for Executive Limousines". You will see from the foregoing that we at Autocruise are, and have always been, involved in work for senior executive personnel. We have always set a very high standard for reliability, presentation, punctuality and professionalism. I would therefore request that you please furnish me with details of the procedure for attaching these conditions to our licences.

Finally, in the face of genuine opposition from the many operators in this and adjacent areas of the new county may I request that the proposed new conditions be amended to a form which would help rather than hinder the activities and financial well-being of small companies in the Private Hire business ?.

Yours Sincerely



24/2/09

I am . Taxi I run private hire and public hire vehicles with in the borough of Macclesfield and I strongly object to the proposed plans to have signs added to the private hire vehicles telling the public that it is a private hire vehicle on the grounds, we use these cars as wedding cars and people would not hire these vehicles for this perpose if they have signs all over them making it harder to make a living from this side of the trade. In the borough of Macclesfield only vehicles allowed to have sign writing on the vehicles are public hire vehicles and this could confuss people even further

\*

yours sincerely

CREWE  
CW2 8SG

25 February 2009

Licensing Section  
c/o Crewe & Nantwich Borough Council  
Municipal Buildings  
Earle Street  
Crewe  
CW1 2BJ

Dear Mr Lee,

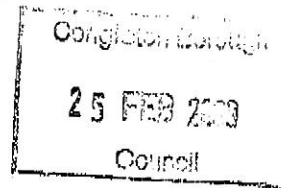
I respond to your letter as follows:

Private Hire Vehicle Licence Conditions

- 1.4        How do you envisage fitting three doors to the side of a vehicle?  
            Can you supply the details of such a manufactured vehicle?
- 1.5        Qualify the reason that the seat size should be of a minimum of 406mm (16")  
            whilst the standard M1 fitted seat is only 15"?
- 2.5        Why should a tow bar no longer be fitted to vehicle? How do you suggest that  
            the luggage of a fully occupied vehicle be taken to the destination?
- 3.8        Surely the lift / ramp / platform would need to be fitted externally to comply with  
            this? Please clarify and offer affordable, practical suggestions for implementing  
            this clause.

Yours sincerely

- Please will you confirm receipt of my correspondence.
- I send copy to email and postal address.



Licensing Section  
c/o Congleton Borough Council  
Westfields  
Sandbach  
Cheshire

CW11 1HZ

Re: Proposed variation in conditions relating to Private Hire Vehicles.

I write to lodge an objection to the proposals.

I am a Macclesfield Taxi Proprietor trading as Sparetime, operating 8 Taxis (Hackney) in Macclesfield with 20 years experience.

My objections are as follows.

Currently Private Hire vehicles in Macclesfield display little to no indications that the vehicle is licenced, other than the Plate, offering no confusion whatsoever to the public (who in reality don't in the main know the difference between Private Hire and Hackney)

This clear difference between Hackney (which at the very least displays an illuminated Roof sign clearly stating the word TAXI) and Private Hire ensures the public virtually ignores Private Hire vehicles which can, without hindrance, go about its business of dealing with advanced bookings only.

As a Hackney proprietor I believe the clear distinction should continue as, because of public perception, it is probable that Private Hire vehicles would affect through abuse and public misunderstanding, my street trade.

Private Hire, because of the vehicle appearance, has opened the door to new sources on income for those operating them from companies forced by the economic climate to outsource transport requirements. Operators (indeed I may venture into this market myself) seeking this form of income stream are under pressure from clients and potential clients to supply virtually unmarked vehicles.

There are clear and valid reasons for maintaining the status quo.

Yours faithfully

A handwritten signature, possibly 'A', written in ink.

Subject: New Conditions Cheshire East.

I believe that you have had some input into the proposed Conditions for Hackney Carriage and PHV's.

With regard to the carrying of High viz jackets and reflective triangles I cannot see any purpose for these, it would be a complete waste of time and money (operators of course). Should any emergency arise then it would not be the first thought in anyone's mind to find his/her jacket to wear, and the same applies to a reflective triangle. In any case it is not legislation in this country to possess either.

In the case of fire extinguishers and first aid kits, which we have had to have for some years, the same applies. In case of a fire the Fire Service recommends immediate evacuation. In the case of injury to a third party I would not administer first aid for fear on being sued. I am neither a trained first aider nor fire fighter nor do I wish to be so and if I was I would not administer first aid anyway.

Your proposal not to allow tow bars is also ill thought as most private hire cars are insured for social use and this could interfere with my social life if I wanted to tow my trailer for such use and also I believe that this infringes my human rights. I cannot afford another vehicle for my social use and why should I? Trailers for luggage use do not require an MOT and I cannot understand your proposal other than to raise revenue.

Finally, your proposal to have signage on both sides of a vehicle would do nothing only to create more expense for operators. A roof sign would be more visible to the public.

I have previously put these views into the appropriate channel for consideration by the new authority but as your colleagues were unable/ reluctant to answer some questions relating to these proposals I now pass my comments directly to you.

It also appears to me that you have little knowledge of our trade and that some of your proposals are little more than justifying your position, and it appears also, that you have been swept away on the tide of the current trend of this interfering 'elf and safety regime to which we are currently exposed.

tiscali.co.uk/jobs/

**licensing****From:**

o.uk]

**Sent:** Thu 29/01/2009 10:45**To:****Cc:****Subject:** New Private Hire Conditions**Attachments:**

I have been trying, to no avail, to raise some points concerning the new conditions and have them answered.

I have been pointed in this direction and so I will outline them again.

#### Vehicle Conditions

2.5 The vehicle shall not be fitted with a tow bar.

I would ask what is wrong with a tow bar? They are an approved option on vehicles throughout the land and any vehicle fitted with one would pass the governments annual MOT. This ban would be detrimental to some operators who carry parties of golfers/skiers. The other point is that some owner operators use the same vehicle for social use, like myself, for perhaps caravanning or other such trailers. You would therefore be interfering with my private life and that is not acceptable.

#### Safety Equipment.

##### 6.3 Reflective Warning Triangle.

There is no legislation for these to be carried by the general public and I cannot see any reason for PHV/Hackneys to carry them. The first rule of a breakdown is to vacate the vehicle so this would be superfluous to the protection of any passengers. A waste of MY money

##### 6.4 High Visibility Vest.

I have been in the trade for 19 years now and I have yet to come across such an incident where one could be used. I am not qualified to direct traffic, I would leave that to the people concerned. In any case I refuse to wear one. Another waste of MY money!

#### 7 Signs and Notices.

Another superfluous idea. A roof sign would be far more visible to the public etc. and more cost effective, i.e. it could be transferred to replacement vehicle without incurring additional cost. Yet another waste of MY money!

I would value your response to justify your proposals.

What Tiscali can do for you - <http://www.tiscali.co.uk/services>

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Mrs V Robson  
Congleton Borough Council  
Licensing Dept.  
Westfields  
Middlewich Road  
Sandbach  
CW11 1HZ

28<sup>th</sup> January 2009

Dear Mrs Robson,

I refer to the proposed new fees and conditions for Cheshire East Council. Having already written to protest at the new fees I move on to the proposed conditions.

#### 2.5 Tow Bars.

Tow bars are an approved option for vehicles and I cannot comprehend why you do not approve of their use on Private Hire Vehicles or Hackney Carriages. I object to this proposal as it will have a detrimental affect on those operators who use trailers to take parties of golfers/skiers etc., and also like many other operators my one and only car I also use for social purposes and I feel I should have the right to have a tow bar for that use.

#### 6. Safety Equipment

##### 6.2 First Aid kit.

The proposed kit sounds more like something that would be carried in an emergency vehicle. I am not a trained first aider, nor want to be, and if the occasion should arise where dressings should be applied I would NOT do so for fear of making a mistake and being sued. The same applies to fire extinguishers, I am insured and should my car burst into flames I would dial 999 and stand well back! The fire service recommends that in the case of a car fire , you evacuate as

quickly as possible. However, as we already carry these items I have no objection.

### 6.3. Warning Triangle.

There is no current UK legislation for cars to carry these so why should you so wish us to do so.? This would be a superfluous item.  
I therefore object to this proposal.

### 6.4 High Visibility Vest.

I cannot foresee any incident where one of these would be of any use. What sort of emergency would it be that I could wear one and where would it be kept in the car? I am not authorised to manage traffic, I would leave that to the experts. I am under the impression that you are here to protect the public, if that is so why do you wish to impose your authority and have a vest for the driver to wear? Surely that is for the individual to decide?

I object to this proposal as I believe that it is an unnecessary and extravagant requirement.

## 7. Signs and Notices

I oppose the use of such permanent lettering as I believe that it is unnecessary and costly, a magnetic roof sign would be much more visible to the public and I would support that.

I have been in this business for 19 years now and do not oppose the carrying of neither a first aid kit nor a fire extinguisher, having had them for years but where does this all end? Snow chains, shovels, traffic cones, rock salt, defibrillator, flashing warning lights, flares? In that 19 years I have never had an incident where I have ever had to use such equipment and yet you wish to burden us with more cost in these very bad trading times. I do like to have a car that is no more than 3/4 years old but then every time I change I will have the extra cost of lettering at a cost of around £50.00 per year.

I move on to Drivers license conditions.

## 4. Medical Fitness

Whilst this will not affect me personally, I oppose the imposition of a medical every 3 years for under sixties. I also do not approve of them at sixty as once

again; there is no requirement for a UK drivers licence. This will put up the annual cost by around £30.00. I therefore object to this proposal.

I find it quite inexplicable that you come up with completely useless ideas and expect the trade to fund them without prior consultation particularly when trade is very unstable. This is typical of a Government body spending other people's money without much thought of the impact it would have on a section of the hard working community. I also find that this is indicative of the present interfering nanny state to which we are currently exposed showing no common sense whatsoever.

Yours very faithfully,

**Lee, Tony**

**From:** licensing [licensing@cheshireeast.gov.uk]  
**Sent:** 04 February 2009 10:34  
**To:** Potts, Tony; Lee, Tony; Robson, Vilma  
**Subject:** FW: ditions

-----Original

**From:** F t@aol.com]  
**Sent:** M  
**To:** licer  
**Cc:** FIR  
**Subject:** Taxi/Private Hire PROPOSED New Fees and Conditions

FAO Mrs K Khan

1st Class Private Hire are based in Knutsford, regulated by Macclesfield B.C. at present. Although based in Knutsford our cars ACTUALLY do travel throughout the North West of England, occasionally London, South Wales and the Southern Coast.

We employ 6 full/part time office personnel and 26 full/part time drivers. Our drivers are all in their maturer years and have generally retired from professional backgrounds. When driving they wear a shirt and tie as standard.

Our customer base is corporate with a few private accounts. 97% of our turnover is account custom. We have 14 licensed vehicles of which 3 mercedes vehicles have licenses under Condition 10. All vehicles have private registration plates to enhance our professional image and we have NO other marks or signs. Our customers EXPECT clean and discreet as possible vehicles.

Here are my views and concerns in respect of your PROPOSED conditions, and I note on the M.B.C Website Public Notice of variation, that we are expected to GIVE FULL GROUNDS FOR OBJECTION, so I would expect a response giving 'FULL GROUNDS' for the proposals.

Can we deal with 'TAXI FEES' firstly.

Private Hire Vehicle (Annual) MBC £ 210. East Cheshire £ 300 = an increase of 43%  
 Joint Hackney/Private Hire Driver Licence MBC £ 75. East Cheshire £ 204. = an increase of 172%  
 All drivers and myself do not have nor will ever have cause for a Hackney Licence, nor will need to learn how to use a taxi meter, therefore we would all oppose a dual type licence.  
 The majority of my drivers are part time, and any significant increase in licence renewal would deter most from renewing their licence.

Five years ago 1st Class bought out our local competitor Briton Tours, there were many price differences between the two companies, which caused me a huge problem as it appears, you, as a council may have. If I had increased a customer price significantly I would have lost their business. I believe that if you as a council increase the fees the way you are proposing you will cause drivers to leave, I should be unable to recruit and you will lose my business, and I will be without a business. Please also consider inflation is less than 3% and wages are generally less than 5%. In view of your significant fees outlined 43% and 172% please could you give full grounds for this outrageous increase.

My next major concern is Magnetic Signs applied to the side of my cars. I accept when Hackney taxi's are in busy town centre area's, people looking for taxi's need to distinguish that they are not getting into the wrong type of persons car, but PRIVATE HIRE should mean privately booked and our customers know where to meet, and know our vehicle registration numbers, as ours are C1 FCH to C15 FCH, meaning Car No. and First Class Hire. If we were forced to apply signs to our cars not only would our cars look unsightly, we would not be able to retain the type of customer base we have worked so hard over the past 10 years to build up. You granting this condition to us would be like picking up your grandmothers glass vase and smashing it.

05/02/2009

I strongly oppose these signs on the grounds they are unsightly and unnecessary and degrade our business. It takes the meaning out of the wording 1st Class Private Hire and Private Hire itself. Please consider signs as 'Optional' if at all. Because of the clientele base we have, if I had my way ALL vehicles would apply for Condition 10.

Another condition is No Vehicle should be fitted with a tow bar. My view is so long as the council have tested and approved the towing unit, surely this free's up any obstruction of luggage within a vehicle allowing passengers in an emergency a free and safe passage to egress from the vehicle. Those officials that visit i.e

Manchester Airport would many times see passengers climbing over cases to get out, vehicles in particular MPV's. (NB. 1st Class Private Hire DO NOT have tow bars.)

I also note you expect vehicles to be equipped with a Reflective Warning Triangle and a High Visibility Vest for the drivers for use in an emergency. Why does the council feel the need to demand this at extra cost to us, when the D.O.T. does not enforce it for a normal MOT. Again another additional cost in a difficult economic climate.

As outlined my two main concerns are ridiculous rises in the fees and 'Stickers, Signs' on our vehicles.

Unless serious consideration is given to your new proposals I will lose more custom than I have already done in these difficult economic times and go out of business. Please do not make life any harder for us small businesses who do things the correct way.

Yours faithfully

æ mail.

George Osbourne MP



**IRE VEHICLE Conditions.**

[@btinternet.com]

Sent: 26 February 2009 21:50

To: licensing CE

**COMMENTS.****1. TYPE OF VEHICLE.**

a) Point 1.7. To avoid any possibility of doubt, this point should be more specific. i.e. State what is NOT acceptable and approved by the council. It would be unacceptable for an operator to purchase a standard, otherwise conforming vehicle, and then find the Council do not approve of the seating configuration. Surely what is to be guarded against is Non-Standard seating configuration modifications .i.e not certified by the manufacturer at the point of manufacture and thereby a material alteration to the specification of the vehicle .....

**2. CONDITION AND MAINTENANCE OF THE VEHICLE.**

a) Point2.5. Tow bars should be allowed as they are frequently needed when taking special needs children,etc. to Summer camps, etc. Also Winter sports enthusiasts with Ski equipment. This is luggage which can not be accommodated safely within any vehicle subject to these conditions. Furthermore a proprietor, with adequate Social, Domestic and Pleasure insurance, may well wish to use a trailer tent or caravan. ( Roof rack's on cars are O.K. IF fitted correctly and NOT overloaded, BUT they are not available for all vehicles, especially mini-buses, which tend to be used for sports enthusiasts and Summer Camps.)

b) It should be an additional condition that operators have the service record for vehicles available for inspection upon request and always produced at the time of licence renewal/test. Failure to produce evidence of servicing at least in accordance with the manufacturers recommended intervals/periods should result in withdrawal / refusal of a licence.

**4. VEHICLE TESTING.**

A) Point 4.2. **There is NO legal requirement for any vehicle which falls within scope of this licensing function, to be tested on anything other than an annual basis.** Research, including VOSA and Department for Transport, has failed to reveal any evidence which would suggest that a seven year old vehicle is any more of a safety risk that say a 3 year old vehicle. **In fact a 3 year old vehicle which has done 150,000 miles, which is not unusual, is as much, if not more, a safety risk to a 8 year old vehicle which has done only 80,000, if maintenance has not been carried out adequately. The crucial factor always is the quality and regularity of maintenance, This proposal is therefore insufficient to satisfy safety, as all vehicles should be regularly tested, and is unfair, even inequitable / discriminatory, against older vehicles which are well maintained.**

The proposal could be considered to be prescriptive, in that it says vehicles over 7 years are not really wanted to be licensed i.e. a hidden vehicle renewal policy. **It is not a Council's function to improve the image of the trade by having a hidden vehicle renewal policy.**

**If safety, and NOT additional revenue, is the issue then a regime of random testing on all vehicles, together with an obligation for evidence of Service History (see 2 (b) above) would better protect the public interest.**

**6. SAFETY EQUIPMENT.**

A) Item 6.2. Caution should be exercised in the contents of the First Aid kit, which seems to grow and grow. Is this the result of adding each of the outgoing councils requirement? 30 Plasters for example is excessive and can not be easily found in a readily available commercial First Aid kit. No problem with carrying First Aid kit with contents as specified by Congleton for example, which was extensive but practical .For a slight bit of humour around a serious subject but with an element of relativity and mis-quoting a well known phrase " Remember we are NOT an ambulance so don't treat us as such!"

7. SIGNS and NOTICES.

a) Points 7.1. & 7.2. The words "Private Hire" add nothing to the message to the public that this is not a Taxi/ Hackney Carriage. In Fact they DETRACT from the message "ADVANCED BOOKINGS ONLY", which should be sufficient. Similarly adding the telephone number of the vehicle operator does nothing other than frustrate operators who do NOT advertise but rely on recommendation for their business and who do not want their telephone number to be made available to all and sundry. The name of the operator should be displayed as this helps the public identify the vehicle at pre-arranged pick-up points. It also gives the public a name to complain about, should the occasion arise. (The public are more likely to notice the operator name than be able to get the licence number of the plate.)

It should be acceptable to have the "signing" on a window, where it does NOT present a safety hazard or restrict the view of the vehicle occupants. e.g. rear luggage area windows on a mini-bus. The lettering is as permanent as lettering on a body panel and is more easily viewed by the public. It is also less damaging to the paintwork of the vehicle which is highly relevant at it's end of PHV life. ( A vehicle lettered on a body panel requires re-spraying at a considerable cost to eradicate the "shadow" of the signing.)

b) Point 7.3. Absolutely agreed that the signage be permanent and non-demountable.

c) Points 7.4, 7.5 & 7.6. Agreed that no other advertising, without prior approval... which makes 7.5 & 7.6 superfluous. However 7.7. , 7.8. & 7.9 should absolutely be retained.

d) Point 7.10. It is suggested that this should more correctly be included in Section 1 Type of Vehicle.

The remaining comments are radical in that it suggests the policy of "Signing" Private Hire Vehicles, in order to distinguish them from Hackney Carriages be abandoned, in favour of adopting "Signing" for Hackney Carriages. It is suggested it would be easier for the public to identify a Hackney Carriage, with it's illuminated TAXI sign AND associated signing i.e. Name of Operator and telephone number and the wording HACKNEY CARRIAGE. This would be make it quite clear for the public what is a hackney vehicle". ( The critical identification would be the illuminated "TAXI / For Hire" light, together with the "signing.") A confusing factor for the public is seeing a Private Hire vehicle with all it's signing, which adds an air of authority / authenticity leading them to think it's a Taxi. (I only wish I had a pound for every time I had to point out my PHV is NOT a taxi).

It would also assist the PHV trade in that certain sectors, corporate, courtesy & chauffeur sectors, have a resistance to lettered vehicles having a preference for minimalist marked vehicles. This is NOT the accepted Executive Contract sector for which section 10 is provided.

As has been proved time and time again, all over the country, no amount of restrictive legislation addresses the problem of well publicised but never quantified rogue PHV operators. Only pro-active enforcement will catch the rogues and act as an effective deterrent. Within East Cheshire, to some extent the trade is self-regulatory as anyone can testify to the re-actions by the Hackney's, which stand on the rank at Crewe or Macclesfield Station, against LEGITIMATE PHV s, either dropping off or picking-up pre-booked fares.

Best Regards

19<sup>th</sup> February 2009

Dear Cheshire East Licensing Committee,

A recent meeting took place with Congleton Borough Licensing Authority Officers and Private Hire/Hackney Carriage operators of the borough; at which proposed changes currently under consideration for the Cheshire East authority area were discussed. Operators later reconvened and would like to suggest the following amendments to those proposals. The operators present at the meeting are listed separately.

### **Licence Fees**

In the present financial climate where many have to realign their business's to allow for falls in turnover, to increase the current fees would make it much harder for operators to maintain what is currently a good level of service.

Though increased fees are inevitable, if the Operators are to maintain and improve the service they provide, we would like to suggest a phased approach to the price increases, which is relative to passenger fare prices from what is effectively the lowest fare area, Macclesfield.

In addition to ease the cost burden for new drivers to our industry, who face several hundred pound costs to meet all the legal criteria required, plus a wait of 8-12 weeks for CRB checks to be completed before they can start earning, we would like to suggest a new one year badge to be issued for new drivers at a reduced cost instead of the current three year only application. This would make it more financially attainable.

### **Vehicle Conditions**

**4. Vehicle Testing:** The value of a rule which states vehicles in excess of 7 years of age is unacceptable, when these vehicles if maintained and well presented still have a market within the hire industry. If a vehicle is deemed to be not of acceptable condition it should not be passed for licence whatever age.

We would further suggest that the Council test date be geared in such a way that it would be due 6 months after MOT testing. Currently some vehicles have an MOT followed by a Council test within one week. This way no additional 6 monthly test would be required. This would ensure that regular 6 monthly safety checks are carried out and provide better value for money for the operator.

**2.5 Tow Bars.** If a tow bar is fitted to a Hire Vehicle this implies the use of a trailer which enables operators to carry outside luggage i.e. ski's or larger than normal amounts of luggage whilst ensuring the passenger areas remain safe. This is a valuable facility to some Operators, We would like to propose that if a tow bar is fitted then the trailer must also be tested for structural integrity, lights, brakes, if applicable, and a council plate fitted corresponding to the vehicle.

## **Deregulation**

Operators feel strongly that deregulation at this point in time would be totally counter productive and we would like to suggest the current zones are maintained until further investigation into the implications be made.

**7.1 Car Markings/Signage on vehicles.** Many operators retain on their client lists executive customers who prefer to travel in un-logo'd vehicles, these vehicles currently carry Council Plates front and rear, have the necessary safety checks and the authority markings inside the vehicles. We believe that the proposed signage to all vehicles will mean that we will lose this type of business. We therefore suggest that vehicle exterior markings be left to the operator's discretion, or reconsidered.

**6. Fire Extinguishers.** Clarification on the subject of testing and who and how this can be effectively carried out is required, some operators questioned the requirement of extinguishers on the grounds that they are not trained fire fighters and their first priority in the event of a fire is to get their passengers and themselves out of harm's way, the presence of an extinguisher tempts a driver into what is a very dangerous situation. The vehicle after all is insured as are all contents, many operators indicated they would take a dim view of any driver who placed himself in harms way to save a vehicle.

**2.7 Tinted Glass.** National and European Law currently states to what degree glass may be tinted. In most cases manufacturers supply vehicles with tinted windows which are legally allowed under current legislation which has been arrived at following extensive investigation and testing. Can we remain within these criteria without adding a further complication to vehicles which are acceptable within the law of the land.

**5.2 LPG** The proposed modifications to vehicles fitted with LPG fuel options are felt to be both illegal and dangerous, and a little ill perceived. LPG systems are legally only fitted by accredited garages and trained engineers, and carry a certificate which is required by all insurance companies prior to cover being provided, this allows no modifications of any kind be carried out by unauthorized persons, the proposed modifications of further shields fitted to tanks would invalidate warranty and insurance and is deemed unnecessary following extensive design and testing by manufactures of the systems.

## **Vehicle Usage**

Currently insurance companies provide policy cover of 'Private Hire/Social and Domestic use' on vehicles, we request the council recognize and allow this usage of vehicles where operators own one vehicle negating the necessity of purchase of two vehicles where one would be constantly parked when not in use, this aside from the financial impact also would be the environmentally friendly avenue.

## **Consultations**

May we finally suggest that a reorientation of the industry operators be appointed to the committee to allow a balanced input to the decision making process from those that any decisions will directly effect.

I would like to thank the committee for taking the time to consider these proposals and attach the list of Congleton Operators who support these proposals.

The following Operators from Congleton Borough were both present and in agreement with above suggestions:

( 18 names )



Dear Sir/Madam

I feel I have to voice my opinion on the new Cheshire East Council's proposed conditions for private hire operators/vehicles/drivers. Apart from the new fees (which i think are outrageous, especially in the current climate) there are several points i wish to comment on.

Firstly regarding vehicles:

1. Condition 2.5 :- Why on earth are we not allowed tow bars?

2. Condition 5.2:- Regarding the spare wheel when you have a doughnut tank fitted. You can buy an emergency tyre inflator, which does away with the need to carry a spare, therefore leaving boot space uncluttered by a spare wheel.

3. Condition 7:- Signs. I am not happy with the amount, and size of the lettering. I would prefer discreet lettering, and why does it have to be stuck on the vehicle? Most of the private hire work I do is contract and account work. I am sure most of my clients would not be happy with the amount and size of lettering there would be on the side of the car which could result in the loss of some clients. Plus the fact you apparently have to get the livery okayed by the council before its put on the vehicle. Why? you've already given the proposed parameters in size and thickness of letters and where they are to be put in these conditions. Condition 8.6:- We've already got two large outside plates front and rear plus one inside the car, why two more inside? I feel that its unnecessary overkill.

5. Condition 10:- Can you please enlighten me as to what you consider to be an executive limousine?

6. Regarding drivers' badges. How long does a driver's badge last for the princely sum of £204.00?

I hope you will take this email in to consideration and respond to any questions raised

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**From:**

**Sent:** 25 February 2009 10:42

**To:** Smetham, Lesley Cllr (Cheshireeast)

**Cc:** Asquith, Marc Cllr (Cheshireeast); hida.gaddum@cheshireeast.gov.uk

**Subject:** HACKNEY CARRIAGE/PRIVATE HIRE DRIVERS AND VEHICLE LICENCE

To Licensing Officer

I TRIED TO SEND THIS TO THE LICENSING OFFICE, EMAIL WOULD NOT ACCEPT. IF YOU GET THIS EMAIL PLEASE SEND IT ON TO THE LICENSING OFFICE THANK YOU.

I currently hold a joint Hackney/Private Hire Drivers Licence and Private Hire Operators Licence in the Borough of Macclesfield. I live in the South of Macclesfield and sent copies of my Email to my Councillors.

#### PROPOSED LICENCE FEES

The annual vehicle fee of £300 (plus I understand an MOT certificate of £50) equates to an increase of £140 for each vehicle or an increase of 66% on the old Macclesfield Borough fee of £210.

I can accept a small increase in cost but a 66% increase when the local economy seems to be in melt down is excessive.

If this goes ahead I assume the Hackney Meter price will be increased by a similar percentage of 66%.

#### SIGNAGE ON PRIVATE HIRE VEHICLES.

We have had no need for our local Private Hire vehicles to have signage on the doors. They are clearly different due to the lack of a roof sign.

Please note my objections to the above and if your charges are put in place I will expect the Hackney Carriage Meter prices to be increased by a similar percentage.

Yours

**Sent:** 27 January 2009 10:54

**To:** Robson, Vilma

**Subject:** Conditions for the new East Cheshire Council

I refer to the above and wish to make the following objections:-

- 1) Two vehicle tests a year for vehicles which are 7 years old and above means such vehicles will be tested three times a year including the MOT - I believe this to be excessive and that one vehicle test a year is adequate.
- 2) Passengers know that Private Hire means pre-booking and the use of signage on vehicles looks most unsightly.
- 3) Lawtons Private Hire has managed perfectly well without high visibility jackets/warning triangles for the past 30 years and I can see no reason for them to be introduced now.

These issues are add-on costs which we can well do without as the present recession is already having an effect on my business and I would expect the East Cheshire Council to support the trade and not drive it into the ground with these thoughtless and reckless costs.

Regards, (

apel)