

Marie Malt

From: Ian Carson <iancarson57@gmail.com>
Sent: 21 August 2015 13:28
To: EH and H Licensing
Subject: New guidelines

To whom it may concern

I received today the updated guidelines and whilst most are common sense I disagree with the following

7.14
it is of no concern to a licence body to have information concerning my credit history it is not your business I would not stop being a fit and proper person business or otherwise if I got a ccj bankruptcy or in fact any form of bad credit due to personal issues in my life i may become ill and not make payments business could become bad but mainly it goes against my civil rights to a private life and I for one will see a lawyer if this is brought in in any shape or form (this not include fraud this would show up on dbs) and no other small business would you have this information

speed awareness course can only be used once in three years can only be for a minor over speed limit and would not effect a driver who has basically cocked up so from a paper work point of view is irrelevant and will not change any outcome for both driver and council team (even insurance does not go up)

7.35
I do not smoke but I do respect the right to I feel it's unfair to stop people from using such devices if they are legal (I don't allow them in my car)
If a member of the public trys to use them I tell them to stop but if it's 2 in the morning and they are drunk they will say it's legal what are you going to do about it which can cause trouble so it's not worth arguing

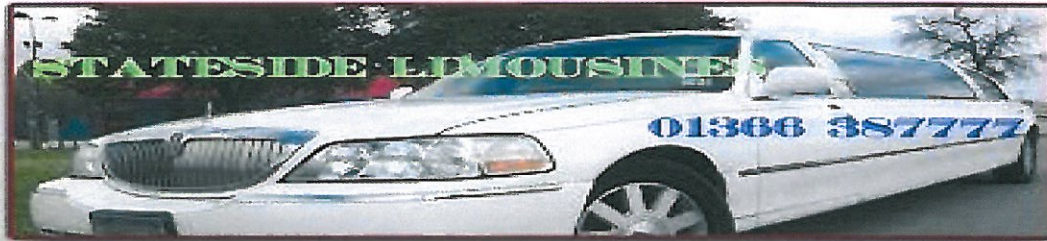
10.4
lights can fail at any time you should have a window to get fixed say 3 to 7 days without penalty (ie common sense)

3.41
if the accident involves persons injured then yes fill forms out. but if say a shunt or wing clipped then no its is a waste of both drivers time and yours
And again will not change outcome

Kindest regards
Ian Carson
20 years in trade

Marie Malt

From: Statesidelimos@aol.com
Sent: 24 August 2015 11:14
To: EH and H Licensing
Subject: Review Hackney& Private Hire Licensing Procedures& Conditions



Dear Sir /Madam

I write concerning the of Review Hackney& Private Hire Licensing Procedures& Conditions.

I would like to state my case for the change in the rules to allow a non badge driver to take vehicle for service, & repair or to MOT station, To tyre shop, to valet centre .ETC

This can be done by having the plate covered up and the roof sign taken of or covered, on a hackney .

on private hire just the plate covered.

on Special events no problem.

And the council could issue another plate (at cost) Hire vehicle NOT IN USE ,to put on in these cases Just like the busses do.

The reason I ask this is a driver is a valuable person who hours should be used driving passengers and rest is important and should not be skimped .To many drivers don't have enough rest as it is.

The council want high standards in maintenance and clean vehicles, all this can be done by none badge drivers , (*I don't mean general use wife going shopping in cab*) The council want high standards so help the trade to achieve this.

How many times do tyres not get renewed when the should and kept on the vehicle a month to long because the driver

is busy , or the car not serviced on time , because airport runs and sleep patterns get in the way.
A simple solution to a big problem.

Regards

Bob Flint

Stateside Limousines

Crosskeys Riverside House

Bridge Street

Hilgay

Norfolk

PE38 0LD

01366 387770

please visit our face book page

https://www.facebook.com/bob.flint.18?ref=tn_tnmr

Marie Malt

From: JULIAN BIRCH <j.birch628@btinternet.com>
Sent: 15 September 2015 18:20
To: EH and H Licensing
Subject: HC&PH - review of licensing procedures & conditions

Dear Sir/ Madam.

I am writing to you as I do not agree with the proposal- ref 7.35- that the use of electronic e cigs etc. are questioned whether they cause any harm or not.

I went on the NHS website and the Public Health England has published a evidence review about e-cigs. The main finding is that they are 95% safer than cigarettes & are a quitting aid. They are even looking to prescribe them on the NHS. So it seems they don't cause any harm.

Also referring to ref 5.3- taking the name and number off our cars will make confusion with customers. How will they know what taxi to get in? Taking the number off also means how will customers contact us? If a customer needs a taxi and see's one of us parked or drive pass they can easily get hold of our number. How will they if it is taken away?

Furthermore reference 3.41 annex A- If I am to report vehicle damage not caused by an accident, then does this include the highways agencies poor road surfaces flicking stones at my car and windscreen- damaging the exterior? The pot holes affecting my tyre wheels and suspension? So do I need to fill out a form every time for this? Will the Highway agency become aware of this and have to act?

Hope to hear from you soon.

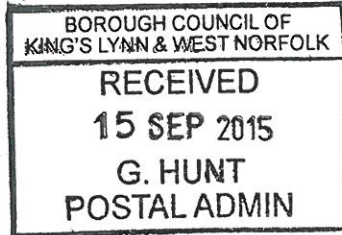
Yours sincerely,
CD0058- Plate number 129
Julian Birch.

MR IAN CALTON & MRS SHARON CALTON-SAYER

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

13 September 2015

John Gilbraith
Licensing Manager
Environmental Health - Licensing.



Dear John,

In response to the letter regarding changes to the current licensing conditions,
Our view on certain conditions are :

Ref : 2.23

We feel that a longer period is required as these circumstances can prove to be difficult.

Ref : 3.49

These can prove to be an asset when it comes to driver and passenger safety.

Ref : 3.27

Will these be of a certain specification ?

Ref : 6.4

In the interest of public safety ALL VEHICALS transporting the general public should be licensed / Regulated .

Ref : 7.14

Personal circumstances should be personal ! Driving faults / incidences should be reported..

Ref : 7.35

Information is enclosed as to the NHS view on e-cigarettes.I (sharon) do NOT agree with a complete ban . I do not use my e-cig with passengers in the vehicle.

Ref : 3.41 Annex A

As regards to all damage not caused by an accident we feel this is OTT as it could come down to reporting a stone chip or slight damage caused in car parks !!

Sincerely,

Ian Calton & Sharon Calton-Sayer.



Public Health
England

Protecting and improving the nation's health

E-cigarettes: a new foundation for evidence-based policy and practice

Introduction

Smoking rates in England are in long-term decline. However, tobacco use remains one of the country's major public health challenges with the harm increasingly concentrated in more disadvantaged communities. Over recent years, e-cigarettes have risen in popularity to become the number one quitting aid used by smokers.¹ This consumer-led phenomenon has attracted considerable controversy within public health and beyond, with the unfortunate consequence of confusion among the general public about the relative risks of nicotine, e-cigarettes and smoked tobacco.

Public Health England (PHE) has a key role in mobilising the evidence base to protect public health and reduce inequalities. Our response to the uncertainty and controversy associated with e-cigarettes has been to establish a sound evidence base. In our first year we commissioned independent evidence reviews from leading UK researchers Professor John Britton² and Professor Linda Bauld.³ These were published in May 2014 to coincide with our national symposium on e-cigarettes and tobacco harm reduction.

Together with Cancer Research UK we have set up the UK Electronic Cigarette Research Forum to discuss new and emerging research, develop knowledge and understanding, enhance collaboration among researchers interested in this topic, and inform policy and practice.

This latest comprehensive review of the up-to-date evidence on e-cigarettes, commissioned from Professor Ann McNeill and Professor Peter Hajek, synthesises what is now a substantial international peer-reviewed evidence base on e-cigarettes. It provides a firm foundation for policy development and public health practice in the context of new regulations for e-cigarettes to be introduced in the UK from May 2016 under the revised EU Tobacco Products Directive (currently under consultation).

Main findings of the evidence review

The report details the steady increase in the use of e-cigarettes in England over recent years (fig 1). This increase has taken place in the context of continued long-term declines in smoking prevalence among adults (fig 2) and youth (fig 3).

Figure 1

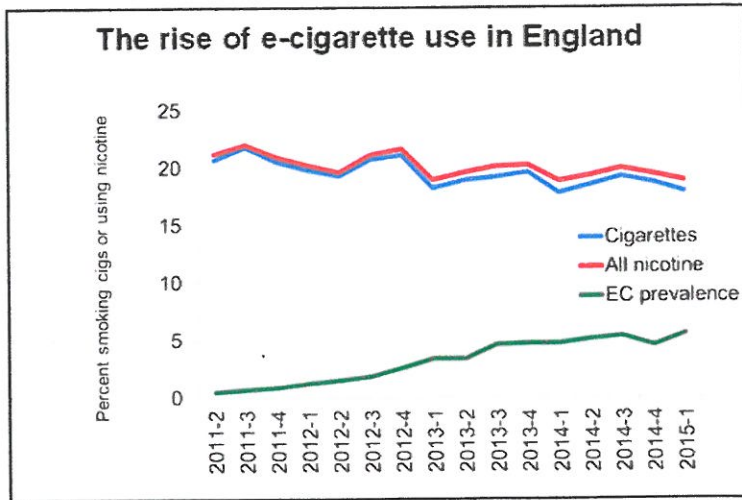


Figure 2

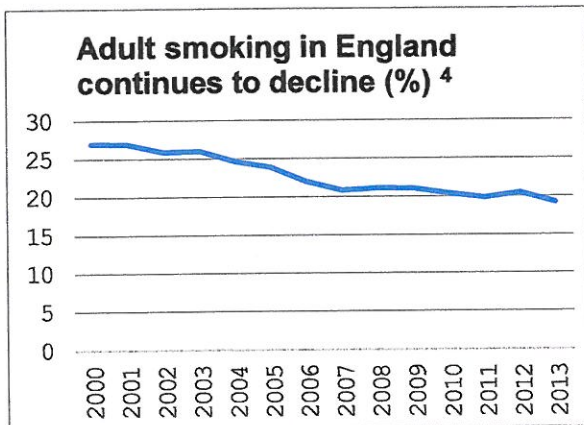
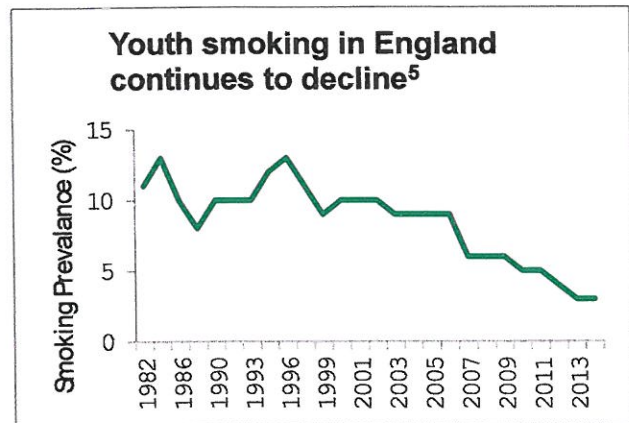


Figure 3



The authors find that among adults and youth, regular use of e-cigarettes is found almost exclusively among those who have already smoked. The highest rates of e-cigarette use are found among adult smokers. E-cigarettes have rapidly become the most widely used quitting aid in England (fig 4).

Figure 4

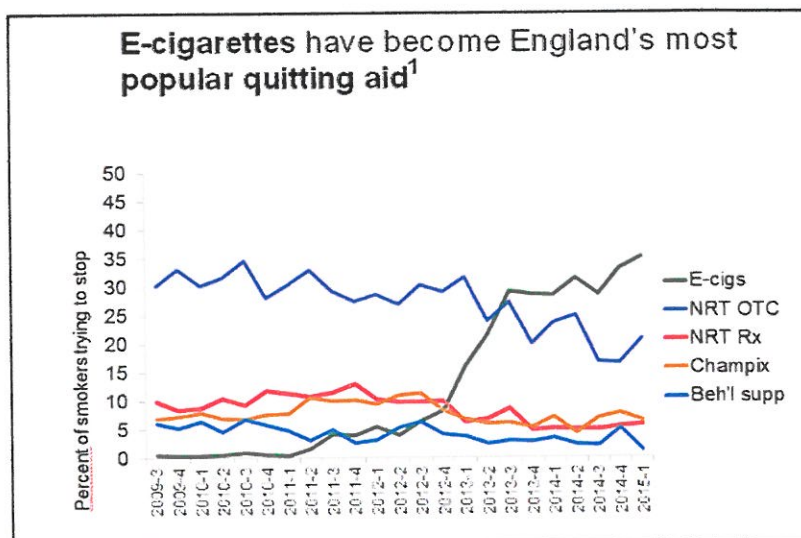
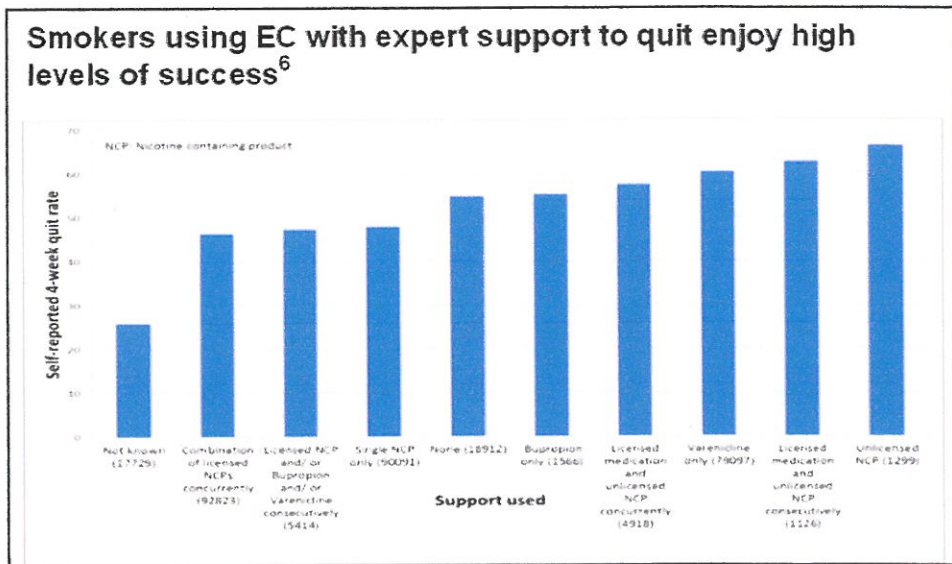


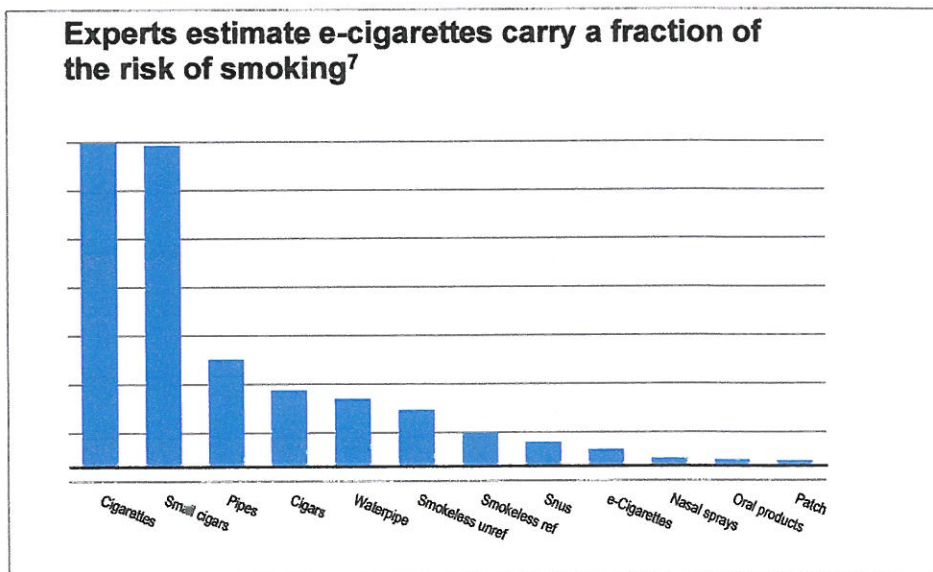
Figure 5



Recent studies support the Cochrane Review⁷ findings that e-cigarettes can be effective in helping people to quit smoking. In local stop smoking services across England the relatively small number of smokers who have combined e-cigarettes with expert support have had high rates of success (fig 5).

Under the current regulatory system individual e-cigarette products vary considerably in quality and specification. We also do not yet have data on their long-term safety. However, the current best estimate by experts is that e-cigarette use represents only a fraction of the risk of smoking (fig 6).

Figure 6



Safety and the perception of risks

It is important that the public be provided with balanced information on the risks of e-cigarettes, so that smokers understand the potential benefits of switching and so non-smokers understand the risks that taking up e-cigarettes might entail:

- when used as intended, e-cigarettes pose no risk of nicotine poisoning to users, but e-liquids should be in 'childproof' packaging. The accuracy of nicotine content labelling currently raises no major concerns
- the conclusion of Professor John Britton's 2014 review for PHE, that while vaping may not be 100% safe, most of the chemicals causing smoking-related disease are absent and the chemicals present pose limited danger, remains valid. The current best estimate is that e-cigarette use is around 95% less harmful to health than smoking
- e-cigarettes release negligible levels of nicotine into ambient air with no identified health risks to bystanders
- over the last year, there has been an overall shift among adults and youth towards the inaccurate perception of e-cigarettes as at least as harmful as cigarettes

Implications of the evidence for policy and practice

Based on the findings of the evidence review PHE also advises that:

- e-cigarettes have the potential to help smokers quit smoking, and the evidence indicates they carry a fraction of the risk of smoking cigarettes but are not risk free
- e-cigarettes potentially offer a wide reach, low-cost intervention to reduce smoking in more deprived groups in society where smoking is elevated, and we want to see this potential fully realised
- there is an opportunity for e-cigarettes to help tackle the high smoking rates among people with mental health problems, particularly in the context of creating smokefree mental health units
- the potential of e-cigarettes to help improve public health depends on the extent to which they can act as a route out of smoking for the country's eight million tobacco users, without providing a route into smoking for children and non-smokers. Appropriate and proportionate regulation is essential if this goal is to be achieved

- local stop smoking services provide smokers with the best chance of quitting successfully and we want to see them engaging actively with smokers who want to quit with the help of e-cigarettes
- we want to see all health and social care professionals providing accurate advice on the relative risks of smoking and e-cigarette use, and providing effective referral routes into stop smoking services
- the best thing smokers can do for their health is to quit smoking completely and to quit for good. PHE is committed to ensure that smokers have a range of evidence-based, effective tools to help them to quit. We encourage smokers who want to use e-cigarettes as an aid to quit smoking to seek the support of local stop smoking services
- given the potential benefits as quitting aids, PHE looks forward to the arrival on the market of a choice of medicinally regulated products that can be made available to smokers by the NHS on prescription. This will provide assurance on the safety, quality and effectiveness to consumers who want to use these products as quitting aids
- the latest evidence will be considered in the development of the next Tobacco Control Plan for England with a view to maximising the potential of e-cigarettes as a route out of smoking and minimising the risk of their acting as a route into smoking

Next steps for PHE

PHE's ambition is to secure a tobacco-free generation by 2025. Based on the evidence, we believe e-cigarettes have the potential to make a significant contribution to the endgame for tobacco. With opportunity comes risk, and a successful approach will be one that retains vigilance and manages these risks, while enabling a flourishing and innovative market with a range of safe and effective products that smokers want to use to help them quit.

From October this year, new regulations prohibiting the sale of e-cigarettes to under-18s and purchase by adults on behalf of under-18s will provide additional protection for young people. The government is consulting on a comprehensive array of regulations for e-cigarettes under the revised EU Tobacco Products Directive, for introduction from May 2016.

As part of our ongoing work to build an evidence-based consensus to support policy and practice on e-cigarettes, PHE will:

- continue to monitor the evidence on uptake of e-cigarettes, health impact at individual and population levels, and effectiveness for smoking cessation as products and technologies develop

- hold a second national symposium on e-cigarettes and harm reduction in spring 2016 to present the latest evidence and discuss its implications for policy and practice
- provide the public with clear and accurate information on the relative harm of nicotine, e-cigarettes and smoked tobacco. Nearly half the population don't realise e-cigarettes are safer than smoking, and studies have shown that some smokers have avoided switching in the belief that e-cigarettes are too dangerous
- publish framework advice to support organisations in developing evidence-based policies on use of e-cigarettes in enclosed public places and workplaces. This follows an engagement exercise conducted with public health partners and the wider stakeholder community to discuss the evidence and invite their input on its implications
- commission the National Centre for Smoking Cessation and Training to provide training and support to stop smoking practitioners to improve their skills and confidence in advising clients on the use of e-cigarettes
- monitor tobacco industry involvement in the evolving e-cigarettes market and exercise continuing vigilance to ensure we meet our obligations under Article 5.3 of the Framework Convention on Tobacco Control to protect public health policy from commercial and other vested interests of the tobacco industry

¹ Smoking Toolkit Study www.smokinginengland.info

² www.gov.uk/government/uploads/system/uploads/attachment_data/file/311887/Ecigarettes_report.pdf

³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/311491/Ecigarette_uptake_and_marketing.pdf

⁴ Statistics on Smoking, England 2015 HSCIC www.hscic.gov.uk/catalogue/PUB17526/stat-smok-eng-2015-rep.pdf

⁵ Smoking drinking and drug use among young people in England 2014, HSCIC, www.hscic.gov.uk/pubs/sdd14

⁶ Stop Smoking Service Quarterly Returns 2014-5, HSCIC, www.hscic.gov.uk/stopsmoking

⁷ McRobbie H, Bullen C, Hartmann-Boyce J, Hajek P. Electronic cigarettes for smoking cessation and reduction. Cochrane Database of Systematic Reviews 2014, Issue 12. Art. No.: CD010216. DOI: 10.1002/14651858.CD010216.pub2

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Marie Malt

From: Paul & Bev Mitchell [airportlinktaxi.com] <paulstaxi.airportlink@virgin.net>
Sent: 22 September 2015 19:32
To: EH and H Licensing
Subject: Review of HC & PH Licensing

Hi

We have the following comments

5.4 - We believe that 3 months is a very restrictive, and should be 6months.

7.14 - We feel that reporting CCJs, bankruptcy, informal action including speed awareness is over zealous on the individual. These do not impact on the ability or overall suitability of an individual. Knowing that a person has these may influence a committee or panel on the the suitability of individual. Informal action is as its name indicates, informal, and therefore is not formal and not reportable, even the DVLA does not report on a licence that a speed awareness course has been taken, nor do they require that CCJs or bankruptcy to be reported on the driving licence. Why should a person be taken to a panel to be questioned why they did not report their bankruptcy - this is an invasion of privacy. One could not expect to provide a credit check for a licence application along with criminal records!

7.35 - the findings are that e-cigs are 90% better for individuals than normal cigarettes. Therefore allowing a driver to use such products when they are not carrying passengers will not impact as a smoking cigarettes would.

Many thanks

Regards

Paul & Bev Mitchell

~~Airportlink Taxis~~

~~Tel / Fax: (+44) 01553 844555~~

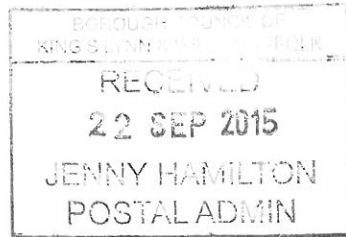
~~Mobile: (+44) 07850 850089~~

~~Website: www.airportlinktaxi.com~~

~~Find us on Facebook: <https://www.facebook.com/airportlinktaxi>~~

~~Skype: info@airportlinktaxi.com~~

Airportlink Taxis - Over 30 years experience in Airport transfers, taxi and private hire for West Norfolk



The Pightle

Burnham Thorpe

Kings Lynn

Norfolk

PE318HT

11/09/15

Dear Sirs

With response to you licensing conditions

Review:

5.4: reinstatement of vehicle licence Definitely from 12 months to 3 months and only to be renewed to the previous licence holder , but to reduce to 3 months but with the exception of proven bad health ie: illness broken arm/leg ect

7.35: electronic cigarettes should be allowed if in the taxi private hire car if by yourself or with the permission of the customer

Also to be considered with the new conditions:

I think it is time for the age mileage to be reconsidered, particularly the mileage. My reason for you to look at this now is that with being able to pass work on to other operators in different areas where they do not have any age and mileage limits like we have in west Norfolk. This is due to new legislation changes from 1st October 2015. I think the age limit of 5 years is fine. Currently we have, when first registering a taxi it has got to be 5 years and under with less than 60.000 miles as a general rule. But for vehicles that have not yet reached the 10 year limit for example a vehicle being 7, 8, 9 years with more than 250,000 miles, there is no rule. Of course you can swap miles for age and vice versa, but like I said the 5 years 60.000 is a general rule. These rules were brought in all to do with deregulation some 10 years ago and have been changed 2 or 3 times since then and of course we do have a better fleet of taxis for this. This has caused a two tier standard of fleet - one being newer cars which I do have, two when a driver gets rid of a car their old cars end up still being used as taxis for those who cannot afford a newer vehicle. This results in having good new vehicles and goodish old vehicles, which of course still get passed on the MOT and can still be used as taxis. I believe if you did away with the 60.000 mileage you would still have a better fleet of vehicles as people could buy at say 80, 90, 100.000 miles cheaper and keep for less time and so the fleet would be newer instead of new ones and old ones. Modern cars will do 200,000 300,000 miles today and I believe a diesel engine is only just run in at 100,000 miles. You may now say what about breaks and wheel bearing, for example, will be worn but these are all serviceable items. For me this would mean instead of buying a £20.000 plus vehicle and keeping it for 4/5 years I could and would buy one at say £10,000 and only need to keep it half the time instead and without borrowing vast amounts of money. I also believe the hackney trade has found its own level with cars and I would also like to point out that there are about 7 cars now licenced in North Norfolk because of this, with the

Council's strict MOT for taxis again the mileage will make no difference to the running or safety of the vehicles. Here are some examples of neighbouring councils rules for taxis:

- Wisbech - no age no mileage for hackney or private hire
- South Holland - under 5 years no mileage for hackney carriages but all wheelchair accessible but drive until 10 years old and no age and mileage limit for private hire
- North Norfolk must be under 10 years old no mileage but must be registered as a taxi before 10 years old then drive until whenever

If you have any questions please feel free to contact me on [REDACTED] email burnhamtaxis@aol.com or write to the address at the top of this letter.

Kind regards

[REDACTED]

M Allen



Marie Malt

From: Kevin Allen <24weststreetwisbech@gmail.com>
Sent: 23 September 2015 12:03
To: Marie Malt
Subject: Rule changes

Sent from my iPhone

Begin forwarded message:

From: Kevin Allen <24weststreetwisbech@gmail.com>
Date: 23 September 2015 at 10:45:24 a.m. BST
To: ehlicensing@west-norfolk.gov.uk
Subject: Rule changes

My reason for you to look at this now is that with mileage limits like we have in west Norfolk. This is due to new legislation changes from 1st October 2015. This is why I think it is time for the age mileage to be reconsidered, particularly the mileage. I think the age limit of 5 years is fine. Currently we have, when first registering a taxi it has got to be 5 years and under with less than 60,000 miles as a general rule. But for vehicles that have not yet reached the 10 year limit for example a vehicle being 7, 8, 9 years with more than 250,000 miles, there is no rule. Of course you can swap miles for age and vice versa, but like I said the 5 years 60,000 is a general rule. These rules were brought in all to do with deregulation some 10 years ago and have been changed 2 or 3 times since then and of course we do have a better fleet of taxis for this. This has caused a two tier standard of fleet - one being newer cars which I do have, two when a driver gets rid of a car their old cars end up still being used as taxis for those who cannot afford a newer vehicle. This results in having good new vehicles and goodish old vehicles, which of course still get passed on the MOT and can still be used as taxis. I believe if you did away with the 60,000 mileage you would still have a better fleet of vehicles as people could buy at say 80, 90, 100,000 miles cheaper and keep for less time and so the fleet would be newer instead of new ones and old ones. Modern cars will do 200,000 300,000 miles today and I believe a diesel engine is only just run in at 100,000 miles. You may now say what about breaks and wheel bearing, for example, will be worn but these are all serviceable items. For me this would mean instead of buying a £20,000 plus vehicle and keeping it for 4/5 years I could and would buy one at say £10,000 and only need to keep it half the time instead and without borrowing vast amounts of money. I also believe the hackney trade has found its own level with cars and I would also like to point out that there are about 7 cars now licenced in North Norfolk because of this, with the Council's strict MOT for taxis again the mileage will make no difference to the running or safety of the vehicles. Here are some examples of neighbouring councils rules for taxis:

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- South Holland - under 5 years no mileage for hackney carriages but all wheelchair accessible but drive until 10 years old and no age and mileage limit for private hire
- North Norfolk must be under 10 years old no mileage but must be registered as a taxi before 10 years old then drive until whenever also I would like to see you not banned e-cigs in vehicles as they are 95% safer than cigarettes I myself am smoking a e-cigarette I have zero nicotine in this and it's basically like smoking A freshener and I also know a lot of taxidivers have actually given up smoking and I think this would be a bad idea if you banned them as it would be like kicking them in the teeth after all that hard work and effort If you have any questions please feel free to contact me on 07873201574

kind regards

K Allen

Sent from my iPhone

Marie Malt

From: alex linke <bluerosecode@icloud.com>
Sent: 29 September 2015 00:44
To: Marie Malt
Subject: Mileage at first registration of taxis.

Hi Marie I believe mr m allen sent this in. I have read and agree with this please see my bit added on the end this letter Dear Sirs Also to be considered with the new conditions:

My reason for you to look at this now is that with being able to pass work on to other operators in different areas where they do not have any age and mileage limits like we have in west Norfolk. This is due to new legislation changes from 1st October 2015. This is why I think it is time for the age mileage to be reconsidered, particularly the mileage. I think the age limit of 5 years is fine. Currently we have, when first registering a taxi it has got to be 5 years and under with less than 60.000 miles as a general rule. But for vehicles that have not yet reached the 10 year limit for example a vehicle being 7, 8, 9 years with more than 250,000 miles, there is no rule. Of course you can swap miles for age and vice versa, but like I said the 5 years 60.000 is a general rule. These rules were brought in all to do with deregulation some 10 years ago and have been changed 2 or 3 times since then and of course we do have a better fleet of taxis for this. This has caused a two tier standard of fleet - one being newer cars which I do have, two when a driver gets rid of a car their old cars end up still being used as taxis for those who cannot afford a newer vehicle. This results in having good new vehicles and goodish old vehicles, which of course still get passed on the MOT and can still be used as taxis. I believe if you did away with the 60.000 mileage you would still have a better fleet of vehicles as people could buy at say 80, 90, 100.000 miles cheaper and keep for less time and so the fleet would be newer instead of new ones and old ones. Modern cars will do 200,000 300,000 miles today and I believe a diesel engine is only just run in at 100,000 miles. You may now say what about breaks and wheel bearing, for example, will be worn but these are all serviceable items. For me this would mean instead of buying a £20.000 plus vehicle and keeping it for 4/5 years I could and would buy one at say £10,000 and only need to keep it half the time instead and without borrowing vast amounts of money. I also believe the hackney trade has found its own level with cars and I would also like to point out that there are about 7 cars now licenced in North Norfolk because of this, with the Council's strict MOT for taxis again the mileage will make no difference to the running or safety of the vehicles. Here are some examples of neighbouring councils rules for taxis:

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- North Norfolk must be under 10 years old no mileage but must be registered as a taxi before 10 years old then drive until whenever.

I support this suggestion

Alex Linke
Hackney 21

Sent from my iPhone

Your ref: HC & PH
Our ref:

Mr John Gilbraith
Licensing Manager, Environmental Health - Licensing
Borough of King's Lynn & West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk PE30 1EX

18th September 2015

Dear Mr Gilbraith

Review of Hackney Carriage & Private Hire Licensing Procedures & Conditions

Further to your letter of 17th August 2015 announcing proposed changes to the above licensing procedures & conditions, we broadly welcome any new & revised conditions that help improve safety and efficiencies thus enhancing the image of the HC & PH industry.

Clearly we have no objections to the legislative changes introduced under the Deregulation Act 2015, and see these as largely positive measures for the industry.

We do have however a number of concerns regarding some of the other proposed changes put forward by BCKLWN and have listed these on the attached sheet. If you require any further clarification of our points do not hesitate to get in touch.

Please involve us in any further consultations to help resolve our concerns. If necessary we would be happy to meet up to discuss further with BCKLWN.

Yours faithfully





Steven O'Donnell
Managing Director
Steve's Taxi Service Limited

Encs.

Comments on other proposed changes by BCKLWN in their Hackney Carriage & Private Hire Licensing Procedures & Conditions Review

Ref	Summary of proposed Change	Our comments
2.8	Right to Work Check	Is this not already covered by BCKLWN under the DBS check? Is there any action required by Operators or individual drivers?
2.23	Death of licence holder	We agree & the refund provision under clause 2.22 must be invoked upon death of Licence holder.
3.22 & 3.38	Altered vehicles inspections & reports	We object on the basis that the terminology in these conditions is quite complex, and could cause confusion. Is it possible to have a 'plain English' explanation as well as education for the trade on implications for modified wheelchair access vehicles to help avoid the trade 'getting it wrong'!
3.49	CCTV	No objection, however, we note you are proposing outward facing CCTV only and have dropped the provision for internal CCTV due to 'Issues regarding data control'. Can you explain what these issues are? We also feel this is an area that requires further discussion with the industry for any future internal CCTV use.
3.72	Trailers & Trailer Plate	Before we can accept or object to this proposal, we need to know if there are any tests or costs associated with trailers & plates? If there are any fees these must be reasonable, proportionate and represent true costs only.

<p>5.3</p>	<p>Private hire vehicle signage</p> <p><u>Possible mandatory insurance signage options</u></p> <p>a)</p>  <p>b)</p> 	<p>We strongly feel that there are 2 separate issues here that require different conditions - a) a <u>mandatory</u> generic sign for Public awareness of insurance validity and b) <u>Optional</u> signage of Operator branding.</p> <p>a) We absolutely agree that a consistent message must be given to the public regarding the insurance validity of Private Hire vehicles vs Hackney carriages. You may have inadvertently confused matters in your proposed wording in that different terms are used in the description of the condition and the prescribed format shown in the example. Given that you are legislating for the Private Hire category, we further believe that the term 'pre-booked' in isolation can add additional complexity. To help make it easier for BCKLWN to enforce the mandatory signage, we also suggest that the plate no be shown on the sign. We would therefore like to suggest that either of the signage options shown opposite be used to educate & inform the public of Private Hire insurance validity.</p> <p>b) Operators must, at their discretion, be able to show their company name & phone number on vehicles as part of their branding & marketing strategy. By the same token, individual vehicle owners may choose not to show an operator company name or number if they are sub-contracting to multiple operators. Such branded signage should also be displayed on each front side door and could be magnetic to cater for vehicles sub-contracting to multiple operators. Such advertising of an operators company is outside the scope of advertising as specified in clause 3.64.</p> <p>We further believe that signage should only be replaced when vehicle licences are coming up for renewal or replacement to avoid unnecessary additional cost to operators.</p> <p>In addition, it is our observation and contention that the current signage procedure & conditions are not being rigorously enforced. This means that those operators that do follow the guidelines are unfairly penalised in terms of cost and time wastage.</p> <p>The suggested formats opposite should ensure that the new procedures can be enforced rigorously.</p>
<p>5.4</p>	<p>Reinstatement of vehicle licences</p>	<p>Not all repairs can be completed within 3 months. Is it possible to amend the provision to say 'If repairs to take greater than 3 months then a written request for possible extension must be submitted to gain BCKLWN approval'?</p>
<p>7.14</p>	<p>Reporting of Convictions etc.</p>	<p>We object to this condition. It does not seem appropriate for BCKLWN to be notified of any non-motoring convictions that have no direct bearing on a driver's ability to perform their job in a fit & proper manner. The previous wording of this clause should therefore be reinstated to remove references to CCJ's. We note that such a requirement is rightly not made for operator convictions in clause 8.23.</p>

7.34	Passenger Transport Badge Holders	<p>We object to this clause. Why place the onus on badge holders to report suspension/revocation of badges? Surely it makes more sense for NCC to inform BCKLWN.</p> <p>What will BCKLWN do when notified?</p>
7.36	Failure to provide Information	<p>We object because the clause as written in the draft does not state what the penalty will be for failure to provide (we assume suspension of licence). Presumably any suspension imposed will be lifted once required information is provided - please confirm.</p>
8.28	Non-licenced staff behaviour	<p>We object to this clause in its entirety. This is a massive can of worms!</p> <p>Firstly, how will this be policed by BCKLWN? What is meant by 'inappropriate behaviour'? How does BCKLWN monitor what its staff do in the operation of their duties and can you make recommendations for operators?</p> <p>Our belief is that this is an unenforceable condition from the perspective of BCKLWN, but should be part of an individual operator's code of practice. The condition should therefore be removed from the draft regulations.</p>
10.4	Penalty Points	<p>We agree with the 'light touch' approach and would urge that common sense be applied for minor infractions.</p>

F.A.O.Mr J Gilbraith
Licensing manager
Environmental Health - Licensing
Borough Council of King's Lynn & West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX

Dear Sir

We the undersigned ask that the following be taken into consideration regarding the Review of Hackney Carriage and Private Hire Licensing Procedures & Conditions.

Legislation changes

Private Hire sub contracting out of area

All undersigned agree that under existing council restrictions regarding the suitability of new vehicles that we would not be working on a level playing field with our adjacent councils.

Action To request that the Licensing Panel

A. Remove the 60.000 mileage restriction on new vehicles to the taxi trade.

The millage cap on new vehicles to the taxi trade was originally introduced ten years ago to stop an influx of old vehicles after deregulation. Several changes to the mileage and age of new vehicles have been introduced over the years, This has introduced newer vehicles to the borough but with the new laws regarding subcontracting work out to surrounding boroughs we feel that it will be no longer appropriate to restrict drivers looking to purchase new vehicles to a millage cap as other borough councils have no restrictions on age or mileage for new vehicles.

Drivers looking for a new vehicle with no mileage restrictions would have a greater amount of vehicles to choose from and may we add better quality vehicles within the same price range.

We have also seen that if drivers wish to carry on using out of age vehicles they are able to register vehicles in other boroughs so that they do not have to adhere to BCKLWN restriction but are still doing the same work within BCKLWN.

We are happy that the age limit of 5 years would still apply to new vehicles and the age limit of ten years still apply this would ensure that the fleet of taxi's still remains high.

B. Allow an appeal procedure for vehicles up to 7 years old with low millage to be considered.

Death of Licence Holder 28 days to transfer licence

Action To request the Licensing Panel pass a three month period for transfer.

We the undersigned agree that a three month period should be allowed to transfer the licence as 28 days would not in some cases be long enough to bury the original licence holder. We feel that some consideration should be given to the fact that the vehicle licence may expire before the three month period ends.

We given great thought and consideration to these issues and feel that these changes would go some way to ensure that drivers in the BCKL&WN are able to compete with drivers in our adjacent borough's. We look forward to hearing your response to our proposals.

Yours Sincerely

Mr. P. A. Butler.
Mr. G. Greenacre.
Mr. I. Carson.
Mr. J. Lomax.
Mr. M. Hanks.
Mr. R. Vadapalas
Mr. J. Reed.
Mr. K. Pelnens.
Mr. A. Dida
Mr. G. Jarusauskas.
Mr. J. Smith.
Mr. D. Oglesby.
Mr. J. Roberts.
Mr. J. Stevens.

Please send any response to

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