

①

Can you arrange for a response to be sent ASAP.

Thanks

Graham H Boase  
Pennaeth Gwasanaethau Cynllunio a Gwarchod y Cyhoedd  
Head of Planning and Public Protection Services  
Cyngor Sir Ddinbych/Denbighshire County Council  
Caledfryn, Dinbych / Denbigh LL16 3RJ  
Rhif Ffôn / Tel No: 01824 706925  
Mobile: 07768 171589  
E-bost: [graham.boase@sirddinbych.gov.uk](mailto:graham.boase@sirddinbych.gov.uk)  
E-mail: [graham.boase@denbighshire.aov.uk](mailto:graham.boase@denbighshire.aov.uk)

Safle  
Web

**From:**  
**Sent:** 10 March 2016 12:20  
**To:** Graham Boase  
**Subject:** Hackney Carriage, Private Hire and Penalty points consultation

Good Afternoon

---

Please accept our full support in the new rules.

Please can you confirm implementation date of the new rules.

I see a new Skoda fabia has been added to the licensed fleet of Denbighshire, I thought this wasn't going to happen again as you can't seat four adult passengers.

Licensing did inform us previously when the Fabia's were put on Grab a Cabs fleet, that this was an error on Licensing's part and wouldn't happen again.

Small vehicle were only allowed as Private Hire in the past.

Is this going to be continued to be allowed in the future?

Drivers are looking for a cheap option when replacing vehicles and asking me for advice.

Nicky F Jones Enquiry

From :

To : "licensing@denbighshire.gov.uk"

CC :

26/01/2016 15:22

Subject : Amendments to Hackney and Private hire policy

2

Dear Sir/Madam,

I am contacting you with regards to the proposed amendments to the Hackney and Private hire Policy.

Whilst I agree in the main with many of the proposals, there are a couple of proposals I would amend slightly these are;

Specification of Hackney Vehicles;

General 1.5

This section specifies a maximum vehicle age of 3 years for new to fleet vehicles, extend this to 5 years but retain the 10 year cut off point regardless of condition of vehicle at 10 years

Body 2.2

Under this section you are specifying the uniform colour of all hackney carriages to be Black, perhaps a more easily maintained colour ie; White or Silver. I agree that there needs to be a standard colour to distinguish Hackney Carriages easily to members of the public.

Apart from these two suggestions I agree with the proposals for Hackney Carriages.

Specification of Private Hire Vehicles;

General 1.4

This section specifies a maximum vehicle age of 5 years for new to fleet vehicles, extend this to 7 years but retain the 12 year cut off point regardless of condition of vehicle at 12 years.

Again apart from the suggestion above I have no issues with any proposals.

My reasoning for the changes I have submitted above is that I think that many owner drivers would suffer some difficulties in obtaining suitable finances for a 3 year old vehicle whereas a 5 year old vehicle in good condition can be purchased at a reasonable cost, avoiding any financial constraints the purchase of a newer vehicle could//would put on family finances for those with such commitments.

I hope you are able to consider these notes and any others should other license holders contact you.

~~██████████~~

~~████████████████████~~

Hackney Plate ~~██████~~

Sent from Mail for Windows 10

Licensing Web Query V3 Enquiry

To : "licensing@denbighshire.gov.uk" <licensing@denbighsh  
cc: :

Subject : New proposals

Ian Millington/EN/DCC, Nicky P Jones/EN/DCC	<input checked="" type="radio"/> New <input type="radio"/> Assigned To But Not Started Closed Date: 26/01/2016	<input type="radio"/> In Progress <input checked="" type="radio"/> Dealt With	<input type="radio"/> Ignore <input type="radio"/> Information Only
Action Taken:			

Dear Sir or Madam. I have read your draft proposals and I would be very supportive of the new measures. The all "black fleet" especially pleases me, but with the sensible phased in aspects of 5 years is very fair and should be more than enough time for operators to get prepared for the colour change. I welcome the draft proposals. This is the first time I have actually wanted to reply to any of the licencing changes due to indifference of the previous proposals but I would say well done and credit were credit is due.

Audit Trail

**Audit Trail**

29/01/2016 12:23:37 Nicky P Jones : Reply with History Created  
 26/01/2016 13:05:46 Ian Millington CLOSEDDATE from "" to 26/01/2016  
 26/01/2016 13:05:46 Ian Millington STATUS from 'ASSIGNED TO BUT NOT STARTED' to DEALT WITH  
 26/01/2016 09:49:49 Stephen Tomes ASSIGNEDTO from "" to IAN MILLINGTON/EN/DCC  
 NICKY P JONES/EN/DCC  
 26/01/2016 09:49:49 Stephen Tomes STATUS from 'NEW' to ASSIGNED TO BUT NOT STARTED  
 26/01/2016 09:49:49 Stephen Tomes has forwarded to the assigned officer : Ian Millington/EN/DCC  
 Nicky P Jones/EN/DCC



To : licensing@denbighshire.gov.uk  
CC: :

Subject : Taxi consultation

Assigned To:	Status:	<input type="radio"/> In Progress	<input type="radio"/> Ignore
	<input checked="" type="radio"/> New	<input type="radio"/> Not Started	<input type="radio"/> Information Only
		<input checked="" type="radio"/> Dealt With	
	Created:		
	16		

Dear sir

In response to your e mail ref the changes you would like to bring in i would like to make a few points

Firstly i understand why the council are doing this as from my point of view (and i have driven taxis for 28yrs in rhyll ) they need to take control of the trade again but just bringing more rules in is not the answer when the council are not enforcing the ones we have already  
I you want to bring in a max 3 year rule for a car coming on the rank going off after 10yrs  
We already have a rule where after 7yrs a. Car must be in showroom condition this rule is not enforced

Also the department of transport on best practice guide recomends against an age limit as they say it is perfectly possible for an older vehical to be in good condition they recomend testing twice a year which we have already

And you proposed that all taxis are black which i think is the wrong colour for road safety the colour should be white or yellow also after the sillyness of this shorts fiasco where the council backed down and allowed then to wear shorts the worse colour car to be in is Black  
I also notice that you say plates should be bumper height or above which will mean people placing plates in there back windows which is wrong

I think that we need to remember what the main purpose of a hackney vehicals is to serve the ranks and NOT radio and school contracts with this in mind i think we should go down the road of all hackney vehicals being wheelchair accessible vehicals M1 approved

And finally i think its wrong that a person can own a taxi firm and also a garage that does hackney test would it not be a fairer system that all hackney test are done at the council garage this will give a more uniform standard of test

Hope these point are put to the councillors at the meeting  
From a Driver who is very passionate about the trade

Audit Tr:

**Audit Trail**

24/03/2016 10:32:51 Nicky P Jones CLOSEDDATE from ""  
24/03/2016 10:32:51 Nicky P Jones ACTIONTAKEN from ""  
24/03/2016 10:32:51 Nicky P Jones STATUS from 'ASSIGN WITH

Licensing Web Query V3 Enquirv

To : licensing@denbighshire.gov.uk  
cc: :  
Subject : Consultation paper for PHV and Hackney

Status:

Assigned To But Not Started  In Progress  Ignore  
 Dealt With  Information Only  
Date: 2016

FAO Nicky

Further to our discussions please see below a number of points which I wish to raise concerning some of the proposed changes that you are trying to bring to the Hackney and Private Hire Sector in Denbighshire.

**Trailers** - you plan to ban the use of trailers for Private Hire on the grounds that they are more likely to be involved in an RTA - and that the PHV being used should have sufficient seating and luggage space for their passengers.

I have obtained information from North Wales Police that confirm that there were 92 Injury Collisions in North Wales between 2011 and 2015 involving a single axle trailer - 42 of those 92 were with cars towing them. NO Private Hire Vehicles were involved in towing a trailer that resulted in an RTA.

The ability to offer a trailer service to my clients is an essential part of my business. Even with an Extra Long Wheel Base Mercedes Vito there are times when a trailer is required to transport luggage in a safe way.

I cater for Ski holidays - where skis cannot be transported in the luggage area of the vehicle and cause a danger if placed in the main cabin. Skis, ski boots, luggage and 8 passengers - can only be serviced with the use of a trailer.

Golf holidays and golfing days - a party of 8 with 8 sets of clubs, golf trolleys and holiday luggage also can also only be catered for with the use of a trailer.

I have also recently be transporting a delegation of Indian workers visiting north Wales - where there stay was up to 2 months. Even just meeting and greeting 5 or 6 off different planes could only be serviced by the use of the trailer - the massive amount of luggage that they brought with them could not have fitted even in my very large luggage area - something that many 9seater minibuses do not have.

**Hackney Cars a need for them to be black to distinguish from PHV.**

I cannot understand why this is even up for discussion - this seems to be making rules and creating work for the sake of it.

The large white light on the roof of the Hackney car saying "Taxi" should be enough of a highly visible symbol to show the public that they are entering a Hackney car.

Should you pass this ruling - will I have to change the colour of my PHV from Black so as not to add the the confusion?

A study over 20 years has concluded that black cars are 47 per cent more likely to be involved in road accidents. - Daily Telegraph June 2010

### Age restrictions on Hackney and PHV

Whilst I applaud the Authority's vision to improve the fleet of vehicles that service the public of Denbighshire I have real reservations about the tightening of age restrictions especially on vehicles new to fleet.

Case Study 1 - looking at cars with approx 60k - 80k mileage.

Popular cars are Vauxhall Insignias and Ford Mondeos.

Insignia - up to 3 yrs old cost ave £7800

Insignia - up to 6 yrs old cost ave £4800

A taxi company running 30 vehicles adopting a policy of renewing a 1/5th of his fleet every year would need to find an extra £18000 EVERY year to fulfill your guidelines.

Similar figures are also true of Mondeos

The problem is accentuated further if you take into consideration the staple vehicle essential for DCC to fulfill its own School Transport policy - the 9 seater minibus.

Mercedes Vito up to 3yr old - £22000

Vito up to 6 yrs old - £14000 - an £8000 difference to enter the market or renew a vehicle.

A Ford Torneo - up to 3 yrs old £15000 - up to 6 yrs old £7000 - again an £8000 prohibitive difference for the Operators

The vehicles already face stringent Compliance Testing every 6 months - you may want to consider introducing a policy whereby once the car is over 6 years old that the Licensing Officer can request a random Compliance Test anytime within the year to be complete at DCC Test Centre with 72 hours of you making the request.

Where are these shortfalls to be made up? Will the people of Denbighshire ultimately pay the price for their own authority's policy?

Prices/fares will have to rise significantly to meet these changes. I suspected many smaller operators could fold - resulting in a declining supply of Taxi's to the public.

Llangollen currently has 1 registered Hackney car with Denbighshire - and the town is serviced by Shropshire plated vehicles who openly advertise in the town and I feel Denbighshire just turn a blind eye to it.

Whilst raising the School Transport concerns - if Licensing push ahead with this restrictive policy I assume that they will have to put in to force for all of the Private Hire and Hackney vehicles that currently service their school contracts.

You will be challenged if you allow taxi companies from outside Denbighshire to continue servicing Denbighshire contracts but not in vehicles up to the standard that you are forcing on your own fleet of Operators.

In addition to the concerns laid out above - I also must look at my business and the high standard of vehicles that I use and will want to buy in the future.

A 5 and a half year old Audi A8 at £22000 or a £13000 BMW 5 Series would be deemed unfit for purpose under your proposed new rules - The Age of the Vehicle can not hold such a high level of judgment on whether that vehicle is suitable for the carriage of Denbighshire's public.

To Licence a Mercedes S Class under 5 yrs old would cost me over £20000 - a 7 year old immaculate S Class with massaging seats, full leather and extra leg room at £14000 would be deemed unfit for purpose!

Having discussed these issues with many of my clients over that last 2 months they have made it clear that the Age of the car as little significance to them.

I look forward to hearing from you.

Kind regards

Licensing Web Query V3 Enquiry

From : To : "licensing@denbighshire.gov.uk" <licensing@denbighsh  
cc: :  
Subject : Proposed Changes Hackney/PH

Assigned To But Not Started  In Progress  Ignore  
 Dealt With  Information Only

Action Taken:

To whom it may concern,

I think the new proposals are excellent, However I have some concerns listed below:

1. Minibus type vehicles are generally commercial vehicles and should have a longer life than cars. If you treat them the same as a car the trade may stop investing in them, this would have an adverse effect on taxi's suitable for wheelchair users.
2. Trailers should be allowed on PH and Taxi's, they should be excluded from ranks due to space. I think its dangerous transporting people to the airports etc. sharing space with loose luggage. Even a purpose built cab couldn't take 4 adults and 4 cases safely using the current rules.
3. With immediate effect, owners/operators should prove they have available funds to maintain their vehicles. Public safety is paramount, I'm shocked how the taxi fraternity gets back street garages to bodge their cars when they break down, they have no maintenance schedule. The use of second hand tyres should be banned, how hard up must an operator be to be fitting tyres off another vehicle that's possibly been involved in an accident.
4. DCC should be more flexible when allowing Private Hire vehicles on. The likes of a Ford Galaxy could carry 6 passengers like it was designed to, because we accept bookings for these cars over the telephone, we can determine its suitability before its dispatched.
5. DCC could reduce the amount of hackneys by increasing the price of the plate and encourage Private Hire by reducing the plate price? (Just a thought)

I hope you have found my comments useful

Sent from [my iPhone](#)

Audit Trail

Audit Trail

09/03/2016 10:20:50 Stephen Tomes ASSIGNEDTO from "" to NICKY P JONES/EN/DCC  
09/03/2016 10:20:50 Stephen Tomes STATUS from 'NEW' to ASSIGNED TO BUT NOT STARTED

7

To : "licensing@denbighshire.gov.uk" <licensing@denbighsh  
cc: :

Subject : Hackney Draft Vehicle Policy.

In Progress  
ned To But Not Started  Dealt With  Ignore  
Date:  Information Only  
'16

The taxi trade earnings have declined over the past few years.

1. With help from the increase in Licensed Plates Issued.
2. Certain companies applying £3.00 fares any where in Rhyl.
3. A lack of visitor's to the area.

Would the Licensing Authority reconsider your draft proposal concerning. PARA 4.2  
That all new vehicle's must be three years old.

I believe this may lead to financial hardship for new and existing owner drivers.

Due to the payment cost of vehicle's up to three years old.

A fairer system would be to replace the word three years old. To the maximum ten years old.

Auc

**Audit Trail**

23/03/2016 10:03:08 Stephen Tomes CLOSEDDATE from "" to 23/03/2016  
 23/03/2016 10:03:08 Stephen Tomes ASSIGNEDTO from "" to IAN MILLINGTON/EN/DCC  
 NICKY P JONES/EN/DCC  
 23/03/2016 10:03:08 Stephen Tomes STATUS from 'NEW' to INFORMATION ONLY  
 23/03/2016 10:03:07 Stephen Tomes has forwarded to the assigned officer : Ian Millington/EN/DCC  
 Nicky P Jones/EN/DCC



8

Licences Enquiry

From :  
onlineforms@denbighshire.gov.uk  
01/04/2016 17:01

To : licences@denbighshire.gov.uk  
cc: :

Subject : Website enquiry - Licences and permits

Assigned To: Ian Millington/EN/DCC, Jo Thomas/EN/DCC	Status: <input type="radio"/> New <input checked="" type="radio"/> Assigned To But Not Started <input type="radio"/> In Progress <input type="radio"/> Dealt With <input type="radio"/> Ignore <input type="radio"/> Information Only
Action Taken :	

**Denbighshire County Council website: Online form submission.**

Posted on: 01/04/2016 17:00:37

Posted from: <https://www.denbighshire.gov.uk/en/resident/contact-us/licences-and-permits.aspx>

**Form post**

**First name:**

**Last name:**

**Your email address:**

**What would you like to contact us about:**

Road and highway licences

I don't expect this to be heard as I am late to submit due to not seeing the email. Firstly a black car is terrible to drive in the summer and is one of the worst colours to keep clean. if the colour is to identify my car as a taxi then what is the top sign for? Then there is costs not only to owners but for the council. You can pay an extra £1000 for black paint so you are looking at about £12000 upwards for a decent 3 year old vehicle. To be honest I couldn't afford it especially if I were to have an accident and have to replace again. We have been on this path before regarding age of

vehicles and as I run a reasonable maintained car that is 7 years old and will last for a few more years I would hope to keep it. There is no age restrictions in the dsa guidelines so until it becomes a national requirement then I am against this rule. This past couple of years Howard has made several visits to the ranks along with VOSA and I feel that the quality of vehicles has improved a lot so these changes are unnecessary and could prove to be very costly. School, hospital, police contracts that the council pays for would inevitable go up in price. Personally I feel these changes could put me out of work, then I would be seeking legal advice and if I had a case I would be looking to recover costs. I really don't want to go down that path. Maybe if I was earning a good living from taxiing my views would possibly be different but the town is dead and I'm not Thank you for your time ~~XXXXXXXXXX~~ Ps. On a lighter note. ..What shade of black???

**Message:**

This automated email has been sent from Denbighshire County Council's Website. The information contained in this email is confidential.

#### Audit Trail

##### Audit Trail

04/04/2016 14:49:03 Stephen Tomes ASSIGNED TO from "" to IAN MILLINGTON/EN/DCC  
JO THOMAS/EN/DCC  
04/04/2016 14:49:02 Stephen Tomes STATUS from 'NEW' to ASSIGNED TO BUT NOT STARTED  
04/04/2016 14:49:02 Stephen Tomes has forwarded to the assigned officer : Ian Millington/EN/DCC

24/3/16

Ref Hackney Proposals

I sent the following email unfortunately I received a failed delivery notice so missed the deadline. Could you please include this in your consultation?

I have an issue with the statement that you will not restrict the numbers of licences issued yet the new proposals will require applicants to provide documentary evidence that there is a need for further licences to be issued.

You will require applicants to provide documentary proof that they have the financial means to maintain their vehicle. How will you enforce this?

The proposal to limit the age of vehicle new to fleet to 3 yrs old and then replace when 10 yrs old will favour the larger fleet operators putting the owner driver at a disadvantage.

Why require black only when London the origin of black cabs have relaxed their r black only rule.

You propose to ban towing. Some licence holders have only one vehicle for work and personal use this restrict their use. If it is an issue of insurance my policy did not exclude towing.

30 MAR 2016

Director

Nicky Jones

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From:  
Sent:  
To:  
Subject:

Policy Changes

Nicky

Thank you for the opportunity to comment on revisions to the Hackney carriage and private hire policy and vehicle specifications.

The Hackney carriage and private hire industry is important to Denbighshire Passenger Transport. We currently spend some £2½m of our school transport budget on such vehicles, some 80% of which is paid to Denbighshire operators. At the outset, I therefore need to emphasise the significance of such these industries. I also need to give you some context in that the budget is currently four per cent overspent with the real likelihood this will increase next and in future years as a result of market and forthcoming transport policy changes, both of which are likely to increase the amount and proportion we spend within these sectors.

The Passenger Transport Section supports and welcomes the improvements you wish to make but would like to raise the following, relating chiefly but not exclusively to PHVs:

1. May I seek assurances that proposals under type approval (Policy para 2.1 and Appendix 1 para 1.1) will not preclude the future licensing or use of so-called minibuses or other seven & eight seat vehicles (including class 4A and 5 vehicles with nine to 16 seats but reseated to eight) always provided that the operator has undergone the necessary recertification and approvals. The reason for this is that such vehicles form an important part of the private hire fleet and their size offers school transport maximum flexibility (and some larger Hackneys are capable of carrying a wheelchair). Any changes to the cohort of such vehicles will have a detrimental impact on the school transport budget. In some areas, the supply of these vehicles is already low and, as a consequence, costs are unreasonably increasing. School transport suppliers need the flexibility to convert vehicles with due haste and with minimum hassle. Any local inflexibilities may result in a commercial advantage to suppliers based in neighbouring areas, such as adjacent to Rhyl and Llangollen.
2. The use of minibuses is also pertinent to vehicles that can carry wheelchairs. Under 3., you quote "making successful journeys is critical [crucial perhaps rather than critical?] to the social inclusion of disabled people... Their education... is specifically improved when journeys become accessible" and I would agree with this rubric. Under 8.1 (b), however, you appear specifically to rule out the majority of larger vehicles capable of carrying chairs (those which can carry more than one) by insisting upon vehicles with only a side entrance. I understand your reasoning but would contend that rear loading can be safe if managed correctly (e.g. if off-street or if the vehicle is so positioned as to face on-coming traffic). Additionally, for those vehicles requiring a tail-lift, owing to the weight and dynamics of that apparatus and the vehicular centre of gravity, the only practical position for such equipment is the rear. The reasons for these comments, therefore, are that the current cohort of such vehicles is already small, demand for them is increasing and other authorities' conditions may not be as robust as those you propose and hence the market may as a result be skewed away from Denbighshire operators. Where we currently carry more than one chair at a time, side-loaders would increase the overall pool required, owing to two vehicles replacing one. Owing to the current disproportionately high costs of hiring such vehicles, any change will have an excessively adverse impact on the school transport budget. The

use of rear loading vehicles should nevertheless only be deemed acceptable for use on school transport following an appropriate risk assessment.

3. I understand the reasons why you wish to set a maximum age limit on vehicles of 12 years. Age is but one factor in terms of quality and an older vehicle need not in itself be either roadworthy or of poor cosmetic appearance. Other determinants such as the mileage travelled may be a better measure. Some specific school transport vehicles undertake fewer than 4,000 miles p.a. Would Licensing be prepared to consider a relaxation for vehicles used solely on school transport. If properly policed, this would not exempt any vehicle, driver or operator from the provisions of the licensing régime (e.g. vehicle testing, plating, etc.) but would relax the age limit in specific, controlled circumstances, perhaps introducing a mileage or condition ceiling. In such circumstances, there should be clear, additional sanctions were an operator or driver to diverge from expected outcomes. There might also be a requirement for such vehicles to undergo additional testing, at the operators' expense. The reason for my raising these issues is that I am concerned that any changes will have a detrimental impact on the school transport budget, one which, as stated above, is already under considerable strain and one where Members are expecting savings on the supply (i.e. commissioning) side.
4. Similarly, under 4.2, you are proposing that new vehicles to the fleet are no more than five years old. I understand the reasoning behind this and the principal is laudable. I would, however, wish to comment that this, too, will have an adverse impact on the school transport budget, perhaps even more so than a 12 year limit. The authority needs to strike a balance between the various competing priorities it faces and I would contend that there are other ways of trying to improve standards (e.g. the requirement for more monitoring/testing and the strategic use of intelligence gathered from test results and roadside monitoring) without such a high bar in terms of vehicle ages that will elevate a budget already under strain. I assume other authorities are not considering such a change, in which case this will disadvantage Denbighshire operators compared to those licensed by neighbours. Subject to suitable controls, you may consider some exemptions for low mileage vehicles as per 3. above.
5. To what benefit (under 2.5 of the proposed PH policy) is the statement, including a requirement for documentary evidence, as to why an applicant believes there is demand for the licensing of an addition PHV. The reason for questioning this is because the higher the volume of PHVs we have, the stronger the market for school transport purposes.
6. Noting that vehicles shall have neither significant corrosion nor accident damage (Appendix 1, 2.1/3), in order to ensure a uniform and high standard, the documents should specify what is reasonable.
7. Notwithstanding my comments under 3. and 4. above, you state under 4.2 that "All vehicles licensed under a new application must be a maximum of five years old...". To me, this implies the vehicle must not be younger than five when, to be consistent with how I read the remainder of the documents, I think you need to revise this to mean the maximum age of five years.
8. Vehicle testing (para 5.1) should in the opinion of Passenger Transport be undertaken solely by Fleet. Specifically, vehicles with sliding service doors should be expected to undergo a more thorough examination (by Fleet) than previously. The reasons for these requests are to ensure consistency, full adherence to the standards you are now prescribing, full confidence, reliable intelligence and, specifically regarding doors, to mitigate against issues we have recently experienced with more than one operator.

9. Are paras 5.2 and 5.3 mutually exclusive? 5.2 implies there will be a higher standard; 5.3 states PHVs shall be maintained to no less a standard than the MOT inspection régime. Do you or will you define the specific standards you require?
10. 5.4 states that PHVs shall be properly maintained and presented. When the new standards begin, would you be able to record and therefore interrogate information on compliance test failures, other issues and spot checks. The reason for this request is, along with your penalty points system already in place, to identify trends within operators as regards their vehicles and use that information as part of a pre- and post-contract quality assessment. The use of management information such as these could obviate or mitigate the need for reactive monitoring, thus saving officer resources within both Licensing and Passenger Transport. Such reports might then usefully be available to your Committee in considering the appropriateness or otherwise of operators. Currently, there is no such information available.
11. Both appendices refer to CCTV. CCTV is of benefit to both driver \*and\* passenger safety. Information therein should be strengthened. Where fitted, no driver should have ready access to the system being used to record within a vehicle and neither should they be able to turn it off. Only the proprietor should have access. This results in something of an anomaly as regards owner-drivers. In such circumstances, it may therefore be that CCTV may be misused. It may also be that parents who are content to have CCTV on school buses may actually feel uncomfortable with there being CCTV in, for example, a feeder taxi for that bus unless there are specific safeguards in place. In such circumstances, Passenger Transport requests that CCTV only be available or used when specifically agreed with school transport colleagues. The reason for this request is to ensure that no driver can misuse CCTV to the safeguarding detriment of a learner.
12. Consider altering the heading "Accidents" to "Collisions". The reason for this request is that the latter term is now the more accepted and "accidents" tend to infer a lack of responsibility.
13. In para 11.4, you refer to paras 12.1 and 12.3. There is no 12.3.
14. Under 13.5, the addition of the word "minicab" might be considered.
15. I do not understand 17.1. Only closed channel equipment shall be used yet earlier in 17.1 you say that effectively drivers should not use such equipment. Under 17.2, rather than drivers be discouraged from using mobile communications while driving, they should be explicitly told not to. This in no way detracts from the importance of mobile communications. The reason for this request is that road safety opinion now suggests the use of any form of mobile communications, including handsfree, poses a road safety risk.
16. Under para 11., drivers and operators should additionally keep records regarding their daily walkround checks. The reason for this request is that this is a key determinant as to how an operator is performing, is a requirement by DVSA for larger vehicles (with nine or more passenger seats) and also to some extent protects the driver and operator in the event of a failure or collision. Where investigation is required, this also gives audit trail.
17. For the purposes of school transport, vehicles should always have an appropriate child restraint available. I am unsure of the current local regulations regarding the carrying and use of booster seats.

The foregoing relates principally to PHVs. To a lesser extent, the principles also apply to Hackney carriages. The use of taxis rather than PHVs on school transport is rarer though, particularly in the

north of the county and in some areas elsewhere, we do rely on both categories of vehicle, including for those users who require transport in their own chairs. Given the scale of our expenditure, ensuring a strong and healthy market is to the benefit of learners who qualify for free school transport as well as the Council itself.

Specifically, regarding Hackney carriages:

18. Proposed vehicle ages for Hackneys are more stringent than for PHVs. This will result in increased expenditure for the school transport budget. The principles as outlined in 3. and 4. above apply. Note, however, it would be unreasonable to ask for any exemption regarding low mileage, as Hackneys are unlikely ever to be solely used on school contracts.

In order to maintain the highest possible standards, how realistic is it for Licensing to ensure that operators and or vehicles stationed in Denbighshire are tested and plated locally. I am aware of one operator who is based within the county but whose vehicles (and drivers) are licensed some distance away. I have no difficulties with or issues in using contractors from other authorities, as this not only satisfies the Council's requirements under its Contract Procurement Regulations, it also makes commercial and operational sense where service users live close to neighbouring authority boundaries. Such operators tend to be licensed with their "home" authority. It does strike me as somewhat perverse, however, that an operator may if they wish licence themselves some distance from their bases when competitors are all certified locally. As standards in Denbighshire improve as a result of your proposals, this may result in this unintended consequence becoming more common.

Finally, may I reiterate the importance of the Hackney/PHV sectors in terms of school transport and that some of the changes you propose will inevitably result in cost increases for which not only is budget unavailable, it is unlikely to be so in the immediate future.

Peter Daniels BSc CMILT MCIHT  
Rheolwr Cludiant Teithwyr /  
Passenger Transport Manager  
Ffôn/Tel: 01824 706847

9. Are paras 5.2 and 5.3 mutually exclusive? 5.2 implies there will be a higher standard; 5.3 states PHVs shall be maintained to no less a standard than the MOT inspection régime. Do or will you define the specific standards you require?
10. 5.4 states that PHVs shall be properly maintained and presented. When the new standards begin, would you be able to record and therefore interrogate information on compliance test failures, other issues and spot checks. The reason for this request is, along with your penalty points system already in place, to identify trends within operators as regards their vehicles and use that information as part of a pre- and post-contract quality assessment. The use of management information such as these could obviate or mitigate the need for reactive monitoring, thus saving officer resources within both Licensing and Passenger Transport. Such reports might then usefully be available to your Committee in considering the appropriateness or otherwise of operators. Currently, there is no such information available.
11. Both appendices refer to CCTV. CCTV is of benefit to both driver \*and\* passenger safety. Information therein should be strengthened. Where fitted, no driver should have ready access to the system being used to record within a vehicle and neither should they be able to turn it off. Only the proprietor should have access. This results in something of an anomaly as regards owner-drivers. In such circumstances, it may therefore be that CCTV may be misused. It may also be that parents who are content to have CCTV on school buses may actually feel uncomfortable with there being CCTV in, for example, a feeder taxi for that bus unless there are specific safeguards in place. In such circumstances, Passenger Transport requests that CCTV only be available or used when specifically agreed with school transport colleagues. The reason for this request is to ensure that no driver can misuse CCTV to the safeguarding detriment of a learner.
12. Consider altering the heading "Accidents" to "Collisions". The reason for this request is that the latter term is now the more accepted and "accidents" tend to infer a lack of responsibility.
13. In para 11.4, you refer to paras 12.1 and 12.3. There is no 12.3.
14. Under 13.5, the addition of the word "minicab" might be considered.
15. I do not understand 17.1. Only closed channel equipment shall be used yet earlier in 17.1 you say that effectively drivers should not use such equipment. Under 17.2, rather than drivers be discouraged from using mobile communications while driving, they should be explicitly told not to. This in no way detracts from the importance of mobile communications. The reason for this request is that road safety opinion now suggests the use of any form of mobile communications, including handsfree, poses a road safety risk.
16. Under para 11., drivers and operators should additionally keep records regarding their daily walkround checks. The reason for this request is that this is a key determinant as to how an operator is performing, is a requirement by DVSA for larger vehicles (with nine or more passenger seats) and also to some extent protects the driver and operator in the event of a failure or collision. Where investigation is required, this also gives audit trail.
17. For the purposes of school transport, vehicles should always have an appropriate child restraint available. I am unsure of the current local regulations regarding the carrying and use of booster seats.

The foregoing relates principally to PHVs. To a lesser extent, the principles also apply to Hackney carriages. The use of taxis rather than PHVs on school transport is rarer though, particularly in the