

Responses to Consultation on Draft Hackney Carriage and Private Hire Licensing policy (Consultation period 7/4/17 to 2/6/17 inclusive)

Response received: 12/4/17 from Hannah Campling - Safeguarding PCC

Points raised	Officer comments for consideration	Direction
<p>1) Paragraph 3.30 of the draft policy refers to Notifiable Occupation Scheme (NOS), this has been replaced by CLPD (Common Law Police disclosure), where there is a 'pressing social need'.</p> <p>2) However, police can only share info if the suspect declares their occupation. There is no legal requirement for this and some don't tell the truth. Recommend consideration is given to require all licensed drivers to subscribe to the update service. This would obviously require status checks to be monitored by licensing staff.</p> <p>3) Would also like to amend paragraph 5.3 in line with DfE 2017 definition of CSE</p>	<p>1) Agreed to amend policy – the NOS was withdrawn 10/3/15 – will re-draft paragraph with reference to CLPD. A meeting is being arranged to discuss MOU (Memorandum of Understanding) and ISA (Information sharing Agreement) with PCC Safeguarding, Cambs Constabulary DBS unit and licensing, to discuss information sharing arrangements and protocols, to ensure public safety.</p> <p>2) Pg 14 of the LGA Taxi and PHV licensing councillors handbook also states <i>'The LGA suggests that all licensing authorities consider making it mandatory for drivers to register for the update service and nominate the licensing authority to receive updates. Licensees should be able to provide evidence of continuous registration and nomination throughout the duration of their licence.'</i> Currently licensing use GB Group to process DBS checks. DBS do not automatically notify if there are any changes to a criminal record even if the person is signed up to the update service, you have to access each individuals record to see if there are any changes. The DBS do offer an update service where multiple status checks can be done on a regular basis, but this requires a specific software interface. Prior to agreeing to amend the policy in this way, enquiries would need to be made with GB Group to ascertain if they can offer this service and evaluate any costs applicable to the council, the time and regularity it would be appropriate to carry out the checks, and consider this with regard to the public safety risk of drivers failing to declare offences and continuing to be a licensed driver. Three year badges have been issued since April 2016. In June 2015 the committee made a determination to carry out DBS checks every 3 years in line with the renewal period of the licence, following the introduction of the Deregulation Act.</p> <p>3) Agreed to amend policy in line with current definition</p>	<p>1) Amend paragraph 3.30 of the policy in line with current legislative arrangements.</p> <p>2) Direction required Do members wish to amend the policy in line with the response and LGA suggestion?</p> <p>If it is amended in line with the suggestion, the PHD conditions and HC byelaws will need updating to require drivers to subscribe, nominate and maintain the subscription throughout their licence duration (3 years).</p> <p>Costs to driver: Fee paid for DSB every three years £44 + £10 admin fee.</p> <p>Fee for update service £44 for initial DBS + £10 admin fee, yearly fee of £13 .</p> <p>3) Amend paragraph 5.3 to new DfE definition</p>
Response received: 7/4/17 from Cllr David Over		
Points raised	Officer comments for consideration	Direction

<p>1) Appalled by standard of driving by licensed drivers, dangerous and reckless behaviour, driven carelessly at excessive speeds.</p> <p>2) Attitude and lack of care towards passengers, e.g. elderly and wheelchairs not accommodated</p>	<p>1) Within all trades there are good and bad, it would be wrong to label all licensed drivers this way. Prior to being a licensed driver, an applicant must hold a valid driving licence for 1 year and pass a driving assessment test, (currently performed by authorised officers, proposal to outsource), and checks are carried out with DVLA for penalty points etc. Applicants who fail to meet the criteria are not licensed. Drivers who are licensed by neighbouring LA's are allowed to carry out journeys within our district. Any person who witnesses speeding, dangerous, reckless, or careless driving by a licensed driver or otherwise, should report each incident to the police (as they are the enforcing body for driving offences), with sufficient information to allow the police to take appropriate action.</p> <p>2) See paragraphs 2.50, 2.53, 3.56, 4.29 4.30, 4.33 to 4.41 of the policy. All hackney carriages are WAV (Wheelchair Accessible Vehicles), the licensing department are in the process of designating such private hire vehicles which meet the criteria in line with the commencement of section 165 and 167 of the Equality Act. The policy aims to put the onus on operators to take customer care diligently, with the introduction for a requirement of a customer complaint policy with pursuance to the licensing department if the customer is unsatisfied with the outcome of their complaint.</p>	<p>1) Should the policy include the highlighted text, to clarify the enforcing body for driving offences?</p> <p>The paragraph could be incorporated in the policy within section 6 - Enforcement</p> <p>2) No amendments required</p>
Response received: 16/4/17 from Bruce Reid		
<p>Peterborough's location and travel resources allow for growth in jobs and wealth. Corporations take this into account when considering where to relocate. The availability of Uber type operators which allow ride sharing should not be over regulated or prohibited by the vested interest of taxi owners, as it will cause substantial damage to the local economy.</p>	<p>Uber do not currently hold an operators licence with this authority. However, nothing within the policy would preclude such an application being submitted and considered for grant.</p>	<p>No amendment required</p>
Response received: 18/4/17 from Police and Crime Commissioner		
<p>No concerns from a police perspective</p>	<p>No amendments proposed</p>	<p>No amendment required</p>

Response received: 9/5/17 from Cllr Fower		
Cllr Fower raised several questions regarding current and proposed conditions and practices. Cllr Fower was provided with clarification and a response to all questions raised. No further communication was received. The emails in full are attached	No amendment to the policy was proposed	No amendment required
Response received: 12/4/17 from Cllr Ray Bisby		
Points raised	Officer comments for consideration	Direction
Would like to add a clause that any warnings given by the police to drivers would be reported by the police to the licensing department, any driver with 3 warnings should have their licence suspended for 1 month. If another 3 warnings received within the year, the licence should be removed. Basis for the proposal is that licensed drivers are putting passengers and other road users lives at risk e.g. A605 roundabout near Kingston Park, witnessed by PES team and Cllr Bisby.	The draft policy proposes a monitoring system for licensed drivers with trigger points for officer review (see 3.75 to 3.80). This would include all complaints received by the licensing department, not just from the police. The imposition of a blanket suspension or action is not accepted as best practice, as each case must be determined on its own merits. Whilst I understand your wish to include warnings given by the police, there is no mandatory provision for the police to record and report on them. The sharing of information by the police is limited to certain provisions, but can take place if there is a 'pressing social need'. The policy also proposes requirements for operators to take more responsibility for the drivers and vehicles they utilise. The issues surrounding this roundabout extend further than just licensed drivers.	No amendment required
Response received: 14/5/17 from Dr Michael Galvin – Addison Lee		
We do not intend to respond comprehensively to the consultation as we are merely operating a contact centre as a licensed operator in Peterborough. We feel that the local taxi and private hire industry and other local stakeholders are better placed to respond comprehensively than us. We fully support the changes that are being proposed to licensed operators.	The response from a licensed operator is in support of the proposed changes to licensed operators	No amendment required.
Response received: 16/5/17 from Trevor Mcsparron		

Points raised	Officer comments for consideration	Direction
<p>1) The criteria on emissions is changing at an ever increasing rate and suggests that in 20 years time, any vehicle which is not 100% electric will by then, be classed as huge polluter. Peterborough could be a low emission zone within 10 years. Government are discussing a diesel scrappage scheme for diesel engines 3 years old. For these reasons the idea that any current vehicles being fit for purpose in 20 years are at odds with 'Environment Capital' and need a unified approach to sustainable travel to improve lives of residents by reducing emissions. The life of polluting vehicles within the trade should be decreased and incentivise the use of 100% electric and make them the standard for 20 year licence.</p> <p>2) What are you proposing to do about drivers who have been suspended by PCC and the company moves to another local authority.</p>	<p>1) (From further reading you will note that the PHDF and PECT have concern with this part of the policy). The reason why the policy was drafted with the proposed emission criteria (which are more or less Euro 6 standards) was to incentivise the introduction of lower emission vehicles to both sectors of the trade (hackney carriages and private hire). Whilst PHV's are presently available in ultra-low emission and 100% electric versions, such vehicles are not currently available for licensing as HCV's. The TX5 Zero Emission Capable Hackney Carriage is being released in London only in 'quarter four of 2017' then available around the world in early 2018. Rapid charge points are being widely installed in London in summer 2017. From 1 Jan 2018 all newly licensed taxis in London must be zero emission capable. All of which is being heavily subsidised by central government and Bluepointlondon. Peterborough did make a bid for a grant, but were unsuccessful. However, further bids will be made where the opportunity arises. The point raised in this part of the response is valid, in so much that the criteria for emissions is rapidly increasing as understanding of the effects that certain emissions have on the environment and people is also increasing. Peterborough is an Environment Capital. If we were to adopt draft policy without amendment a, vehicle licensed which met the criteria (Euro 6) could still be licensed in 20 years. Current conditions would allow a HCV to be licensed for 15 years from new. As licensed drivers are on the roads for long durations, they can be amongst those who are most affected by poor air quality from high emission vehicles.</p> <p>2) The sharing of information between this council and other partner agencies including neighbouring authorities is detailed within the policy, see sections 1.37, 1.39 and 3.3. However, to address this specific point, the licensing department are working with partner agencies seeking to implement the Norfolk model' as laid out in of the LGA Taxi and PHV licensing councillors handbook (Dec 2016). The Norfolk model is whereby a LA which refuses or revokes a drivers licence on certain grounds, pass this information onto the police, who make note which can appear on future enhanced DBS record checks. Thereby allowing notification to the new issuing authority when they request an enhanced DBS check. A DBS check is required by this authority upon application and renewal. It is anticipated that support</p>	<p>1) Direction required: Do we carry on with the draft proposal or amend? We could amend our decision and strengthen our environmental resolve and only extend the life of vehicles for an extra 5 years if they were Zero Emission capable. That way when the TX5 is released for general sale in 2018, the policy would then extend to both sectors. NB: Without an amendment to vehicle conditions it would still allow a diesel HCV to be licensed for 15 years.</p> <p>We could take London's lead and also require in the policy and vehicle conditions that only zero emission capable vehicles will be newly licensed from 20???. (Such date to allow sufficient expansion of the charging point infrastructure). Thereby allowing proprietors to make informed future buying decisions.</p> <p>2) Whilst operation of the Norfolk model' is not specifically mentioned in the policy, (it is a model we wish to adopt) information sharing with police and neighbouring authorities is.</p> <p>No amendment required</p>

	for this model will also be adopted by neighbouring authorities and constabularies.	
3) Is it right that a company can reap profits from working in our city whilst not conforming to the standards? This practice should be banned. Where it can be proved that a company or driver is predominately operating in that LA area, they should register there too.	3) There are many which would agree with this point of view, but it would require a change in legislation to implement. The council can only administer within the current legislative framework.	3) No amendment required
4) The ability to pay contactless should be compulsory	4) Many operators have the ability for cashless payment e.g. via an app on a mobile phone. Whilst the council encourages operators and proprietors to seriously consider cashless payment options, (as it is a safety feature for drivers, as well as a convenience for passengers), the council must also consider the financial burden it could have on the smaller and 'one man' operators, so has not imposed it as a condition at this time.	4) No amendment required
5) HCV's are no longer unique in appearance.	5) The council has approved the following types of vehicles which may be licensed as a hackney carriage: London Taxi models LTI (the traditional 'Black Cab'), the Mercedes-Benz Vito, and the Peugeot E7. Of the approximate 150 HCV's licensed, approximately 132 are the traditional 'black cabs'. It would be against competition law to only licence one type of vehicle as a hackney carriage, as it would result in a commercial advantage for one manufacturer. NB: HCV's licensed by other LA's can be used for private hire purposes within this authorities boundaries.	5) No amendment required
6) PHV's without door stickers, this needs enforcing.	6) The licensing department carry out ad hoc compliance checks and enforcement on all conditions. The designated approved testing centre (Amey) also check this aspect on vehicle inspections. Again, PHV's licensed by other LA's can carry out bookings within our area, those vehicles are not subject to compliance with this condition.	6) No amendment required
7) Agrees with the amendment to critical failure.	7) In agreement with the proposed policy	7) No amendment required

8) Only approved PCC garages should carry out the yearly MOT to avoid back street, corner cut repairs.	8) This is already in place, (see sections 2.33 to 2.40) only the council's approved testing centre (Amey) can carry out yearly and six monthly vehicle testing.	8) No amendment required
Response received: 16/5/17 from Mohammed Tauseef		
1) The new complaint procedure, taxis are an easy target to be reported	1) As licensed drivers are professional occupational drivers, they should be aware of all aspects of Road Traffic legislation and be accountable for their actions. They should drive with consideration to other road users and weather conditions, only park and allow a passenger to alight the vehicle where it is safe to do so. They are also expected to provide good customer service. Where members of the public consider that a driver has failed in any of the above, they should be able to make that known.	1) No amendment required
2) Low emission cars are not cheap to buy especially electric. Recommend increase in age limit into the trade from 6 to 7 years with no mileage restrictions.	2) In February 2012, following a consultation, the committee increased the age limit PHV's could enter the trade, from 3 to 6 years. The mileage restriction was introduced at the same time to ensure that any vehicle being licensed for the first time would be of an average mileage, therefore not allowing older vehicles with high mileage to become licensed. Critical failure was also introduced at this time due to concerns that vehicles would not be adequately maintained. Concerns were also raised that the change would flood the market with PHV's thereby having a detrimental effect on the trade overall.	2) The call to increase the age limit for licensed vehicles, is raised in several responses, do we want to revise our conditions in this regard or maintain the status quo?
3) Big operators are exploiting and have monopoly within the trade. Fixed prices are damaging independent drivers. All drivers should charge meter prices.	3) Please refer to paragraph 1.28 and 7.3 of the policy. There is no provision within the legislation which would permit the council to set the fares for Private hire work.	3) No amendment required
4) Council charges are too high, charging drivers for transfer of ownership, change of address. Charging £155 (for renewal of vehicle) is too much.	4) See paragraph 7.1. The council has a duty to ensure that the fees set are on a cost recovery basis. The fees charged reflect the cost to administer the process.	4) No amendment required
5) The service from the council to the trade has gone down, nobody picks up the phones and messages left won't be answered for a few days.	5) The licensing department is a very busy office, as it administers and regulates many different types of licences for multiple businesses. Generally, where callers have left their contact number, all phone messages left, are returned on the same day. In some circumstances, (due to staff leave or sickness) the call may be returned on the next	5) No amendment required

<p>6) Should allow for a free re-test if a vehicle fails the MOT, charging £21 for the first re-test is unfair.</p>	<p>working day. This response timeline is within the councils response timeframe policy.</p> <p>6) The approved testing station must be able to recover their costs for the work they carry out. Vehicles should be serviced in accordance with manufactures requirements and presented to the testing station in a clean condition and in full working order. Proprietors should have preventative maintenance in place, the 12 monthly and 6 monthly tests carried out by the testing centre, is to confirm a level of safety and quality, rather than to highlight what maintenance needs to be carried out. See paragraphs 2.31 and 2.32.</p>	<p>6) No amendment required</p>
<p>Response received: 22/5/17 from PECT (Peterborough Environment City Trust)</p>		
<p>1) Would like clarification on what constitutes a LE HCV. Supports the aim to get more LEV being used in the city, but expects the definition of LE would change over time as technology improves. Need to ensure future proofing, what is considered LE now does not mean it is automatically allowed to operate in 15/20 years time. Pollutants should be regularly checked and updated and remove less well emission performing vehicles. Other cities are making stringent requirements for low and zero emission vehicles, Peterborough should be equally ambitious to decrease pollution across the city.</p> <p>2) Agrees with the change proposed, to remove the return to base condition for PHV and replacing it with designated car park waiting, provided the rules are enforced.</p> <p>3) Agrees with the change in policy for critical failure, to allow a re-test within</p>	<p>1) The low emission criteria within the policy are more or less Euro 6 standards. These standards take into consideration the weight of the vehicle, which is why it is higher for HCVs. It is logical that as time moves forward the emission criteria is likely to become more stringent for vehicle manufacturers. The proposals in the draft policy would allow a diesel (Euro 6 compliant) HCV to be licensed for a maximum of 20 years. From 1 Jan 2018, all newly licensed taxis in London must be zero emission capable.</p> <p>2) The response is in agreement with the proposed changes. The licensing department communicate with representatives of the trade and issues of non-compliance may be discussed. The licensing department carry out various ad hoc compliance/enforcement checks during the daytime and evening. Appropriate action is taken where non-compliance occurs.</p> <p>3) The council expects proprietors to maintain their vehicles (see paragraphs 2.31 and 2.32). The licensing department have regular</p>	<p>1) Direction required – Refer to prior response on page 4 of this table</p> <p>2) No amendment required</p> <p>3) No amendment required</p>

<p>30 days. But is cautious as proprietors may put off maintenance as they know they will now have additional time. Suggests additional fees are imposed for re-testing to discourage proprietors who fail to maintain their vehicles.</p>	<p>contact with the approved testing centre, should this type of behaviour occur, we would work together to ensure that vehicle standards are maintained and public safety is protected.</p>	
<p>Response received: 28/5/17 from Ash Hussain</p>		
<p>1) Cross boarder hiring of HCV's from neighbouring authorities being used for PH purposes within Peterborough is making it harder to earn a reasonable living. Acknowledges that case law has determined that it is not illegal, but suggests that it is immoral. Peterborough's standards are high.</p> <p>2) Makes mention of a House of Commons debate on 4 June 2016 between Andrew Gwynne and Andrew Jones, the Parliamentary Under Secretary for Department of Transport regarding cross boarder hiring. Suggests that the Under Secretary stated the problem should be addressed by LA's as they have full power to rectify under the Local Government (Miscellaneous Provisions) Act 1976.</p> <p>3) Suggests that Peterborough should amend the current operators conditions to require them to only utilise drivers and vehicles licensed by</p>	<p>1) Case law (Newcastle City Council and Berwick-Upon-Tweed Borough Council) determined that cross boarder hiring (as described) is not illegal. It would be inappropriate for the council to attempt to regulate in opposition of case law.</p> <p>2) Hansard notes the debate took place on 4 May 2016. The debate referred to the Newcastle, Berwick Upon Tweed High Court determination that Berwick Upon Tweed licensed drivers were operating entirely within the legislation. (The drivers were getting licensed, then operating in neighbouring authorities areas). The power referred to by the Under Secretary, is the ability for a LA to refuse to grant a licence if the applicant does not intend to predominantly carry out work within the issuing authorities area. For the above solution to work in Peterborough's circumstances, it would require the neighbouring authorities, (whose drivers are not predominately working in their district), to adopt the condition, then refuse to grant their application. (It is for each LA to determine their own conditions.) This is the course of action Rossendale took, from 2017 they will refuse to grant licenses if the applicant does not intend to use the vehicle in the borough of Rossendale. The licensing department work with neighbouring authorities and share information regarding non-compliant drivers.</p> <p>3) A change of conditions to this suggestion would conflict with case law. It would require a change in legislation, which is what Andrew Gwynne was requesting to take place in the debate in May 2016, along with other proposed amendments.</p>	<p>1) No amendment required</p> <p>2) No amendment required.</p> <p>3) No amendment required</p>

the same authority. i.e. The operator would be in breach of condition, if s/he employed a HCD and HCV not licensed by this authority. Peterborough has good sets of conditions for vehicles and drivers and should impose this for operators. The council are missing out on fees.		
Response received: 25/5/17 from Tahir Shafiq		
Requests that the age of HCV's extended by 5 years. (Thereby allowing all currently licensed HCV's to be licensed until they are 20 years old)	It is proposed to only extend the life in service of low emission vehicles. However, as there are similar requests within other responses, members will be requested to determine. Currently HCV's are de-licensed after they are 15 years old (from date of first registration).	Direction required: Members to determine alongside other responses and proposals received regarding the vehicle age policy and emission standards.
Response received: 30/5/17 from Mir Afzal		
As above, requests the extension of Hackney carriages within the trade for an extra 5 years.	Please see response above.	As above, direction required from members
Response received: 30/5/17 from Mohamed Chahid		
As above, would like to extend the age of life of HCV, due to current financial climate and fixed price fares, makes it difficult to make a living and afford essentials. It's hard and impossible to buy another taxi.	Please see response above	As above
Response received: 1/6/17 from PHDF (Peterborough Hackney Drivers Federation)		
1) PHDF welcome the proposed amendment regarding critical failure. A suspension rather than immediate de-licensing has been a goal, the 30 day period (to get the vehicle re-tested within) is reasonable. As is de-	1) In agreement with proposed policy	1) No amendment required

<p>licensing, if the vehicle does not pass with this period.</p> <p>2) Would like the committee to reverse the decision on vehicle re-test fees for the first failure, would request for the first re-test be carried out free of charge, then apply a fee on subsequent re-tests.</p> <p>3) Disagree with the proposal to extend the life of Euro 6 standards at this time, it's not in the interest of all parties. Perhaps wait until the TX5 is more freely available at the end of 2018.</p> <p>4) Would like the committee to consider bringing Euro 5 standards now and Euro 6 from 2019, this would allow electric range extended vehicles to become established, offering greater choice to the trade.</p> <p>5) The trade would be prepared to welcome proposals to change the current health check to Group 2, but feel that it should not be required every 3 years, as it is excessive and unwarranted. They feel they were misled in a consultation meeting, that three years was the norm, and present details of frequency requirements in other LA areas showing various timescales. They state that the HSE requirements are aimed HGV and PSV's.</p>	<p>2) The approved testing station must be able to recover their costs for the work they carry out. They have stated that in some circumstances, (e.g. where the rectified repair is a simple visual check) they are performed free of charge. Vehicles should be serviced in accordance with manufactures requirements and presented to the testing station in a clean condition and in full working order. Proprietors should have preventative maintenance in place, the 12 monthly and 6 monthly tests carried out by the testing centre, is to confirm a level of safety and quality, rather than to highlight what maintenance needs to be carried out. See paragraphs 2.31 and 2.32.</p> <p>3) The TX5 is the London Taxi Company zero emission capable hackney carriage. The TX5 is due to be released in London only in the last quarter of 2017, then available around the world in early 2018.</p> <p>4) The TX4 Euro 5 has been available from 2012, the TX4 Euro 6 has been available from 2015, the TX5 zero emission capable is available from 2018. The London Taxi Company website states; <i>'TX4 Euro 6 compliant means its pollution levels, on average, are 71% cleaner than Euro 5 models and show a 83% reduction in Nitrogen Oxides (NOx)'</i></p> <p>5) Agreement for the introduction of Group 2 medicals but disagrees with the frequency. I apologise if they felt misled, the statement was that Group 2 is the norm, frequency was discussed later. As stated in the meeting the DfT Taxi and Private Hire Vehicle Licensing: Best Practice Guidance (March 2010) paragraph 67 states: <i>'It is clearly good practice for medical checks to be made on each driver before the initial grant of a licence and thereafter for each renewal.'</i> They deem it appropriate due to the demanding role of a licensed driver. LA's must have due regard to DfT guidance.</p>	<p>2) No amendment required</p> <p>3) Direction required; Members will be requested to determine which way the policy should proceed.</p> <p>4) As above</p> <p>5) Direction required, would members like to amend the proposed frequency of Group 2 medical health checks?</p>
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<p>They propose the Group 2 medical should be required upon new application, then at 45, then at 55, then 65, then annually thereafter.</p> <p>6) Agree with the proposal to display a part 1 and part 2 notice in the interest of public safety. They would however like to amend the wording as it invites only negative comments. Suggests removal of the word complaint and provide 'Should you wish to comment positively or negatively on any aspect of your journey today...'</p> <p>7) Accept proposal of three stage trigger point monitoring system for drivers</p> <p>8) Agree with the proposal to remove the PHD return to base condition and replace it with the new condition, on the grounds that it limits needless traffic in the city centre, thereby reduces congestion, removes temptation of PHD illegally plying for hire and reduces pollutants and greenhouse gas emissions. But do have concerns about compliance and enforcement of the scheme</p> <p>9) PHDF have concerns regarding the proposal to outsource the driving tests for HCD. Ask for special care to ensure it does not lead to an unwarranted increase in fees. Will the outsourcing process invite multiple tenders in order to be competitive?</p>	<p>As shown in the document submitted by PHDF, LA's differ in this regard, however, South Kesteven and South Holland both require a Group 2 every three years.</p> <p>6) Agreement of proposal, it is a valid point that the word complaint does only invite negative matters. It would be appropriate to remove the word complaint and replace it with 'comment positively or negatively'</p> <p>7) Response in agreement with draft proposal</p> <p>8) Response in agreement, the new condition reads; Once a passenger has alighted the vehicle, the driver may park the vehicle whilst waiting for the next booking, provided that there are no parking restrictions, it is not causing an obstruction, and not within the defined city centre area. Private hire vehicles and drivers waiting for their next booking with the city centre area will be required to wait in the following designated car parks, Wellington Street, Wirrina or Pleasure Fare, until the vehicle is booked and required to proceed to the destination at the appointed time within the city centre. The council reserves the right to restrict private hire vehicles from these car parks as and when necessary, for example a city wide event. The licensing department take appropriate action where non-compliance occurs. The licensing department will continue to have meetings with the PHDF where any non-compliance issues can be discussed.</p> <p>9) The council has existing arrangements in place regarding tender and procurement. These will be followed appropriately with regards to appointing a provider. The concerns raised are understandable, consideration will be given to the cost and availability of tests. Most other LA's use external providers for the driving test as it ensures that the person undertaking the role of examiner is specifically trained in this role</p>	<p>6) Agreed to amend wording on part 1 and part 2 notice.</p> <p>7) No amendment required</p> <p>8) No amendment required</p> <p>9) The concerns raised will be taken into account during the tendering/procurement process.</p>
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Outsourcing to only one provider creates a monopoly, as is the case with Amey which is unsatisfactory.		