

RAY-AL COACHES

Limited

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To Huntingdon District Council

01/10/2021

Attached is my letter for the Hackney Carriage & Private Hire Policy Consultation and an article from the Cams Times.

Yours Sincerely



J R Robinson Managing Director of Ray-Al Coaches Ltd

ccc: Copy to Councillor Ryan Fuller (Chairman)

NEWS

In brief

Transport crisis

An "unprecedented crisis" faces Cambridgeshire schools and colleges in transporting students by buses or taxis.

The county council described the situation as such as it asked for all parents to be patient as it works "tirelessly to minimise the impact of driver shortages on school routes".

The council says this is due to the unprecedented crisis taking place nationally.

For now, Peterborough City Council and Cambridgeshire Council believe they are able to fulfil all school arrangements.

But this could change in the coming weeks, said a county council spokesperson. There are also delays for new arrangements due to a lack of bids from transport operators, many of whom are struggling through a shortage of drivers.

Both councils are working on contingency plans should the problem escalate, including the potential for

The council says they understand this is an anxious time for parents and carers.

Hospital repairs plea

Hinchingbrooke Hospital is in "critical need" of being rebuilt by 2030 due to serious structural issues, an MP has told the Government.

Huntingdon MP Jonathan Djanogly says the site is in "urgent need of investment".

It comes as the reinforced concrete (RAC) used to build it in 1965 is now past its 30 year lifespan.

That means panels used in the construction of the hospital roof and walls could be "seriously affected by structural issues".

Eighty per cent of the hospital has the concrete panels covering buildings that deliver clinical services.

Mr Djanogly has told the government that there should be no patient accommodation in buildings with these specific RAC panels at the latest by 2035.

In addition, there are wider issues affecting the entire site in relation to water, medical gases, electricity and other parts of the support infrastructure which are not able to support the hospital.

Driver who crashed into wall was drink and drugs free



The crash in Churchill Road, Wisbech, forced closure whilst police and a recovery truck swung into action clearing away the car and the mess.

PHOTO: POLA JING (1276) LANC

A BMW driver found himself uncomfortably trying to explain to police how he crashed into a brick wall.

Police checked if he had been drinking. He hadn't.

They checked if he had taken drugs prior to the crash. He hadn't.

A breath test was carried out "the driver blew zero," said police on their Fenland Facebook page.

"A Dettol-Wipe was also carried out and that was negative."

The crash in Churchill Road, Wisbech, forced closure whilst police and a recovery truck swung into action clearing away the car and the mess.

"The vehicle was recovered, added the police spokesperson.

"The driver has been interviewed and reported to the scene."

Local councillor Billy Backler told police: "Micky Mouse driving."

And he thought the driver "should know what a Highway Code looks like and as for the power picture speaks for itself."

Hare coursing bans

A group of men who were caught hare coursing in Cambridgeshire have been handed orders banning them from any similar activity in four counties.

Thomas Connors, 33, Patrick Rooney, 36, Anthony Connors, 34, and James Bell, 26, were first spotted by police on land in Abbot's Ripton, Cambridgeshire, on November 4.

Officers from the force's Rural Crime Action Team (RCAT) caught the four men, who were also with a 12 year old boy driving through a field looking for lures.

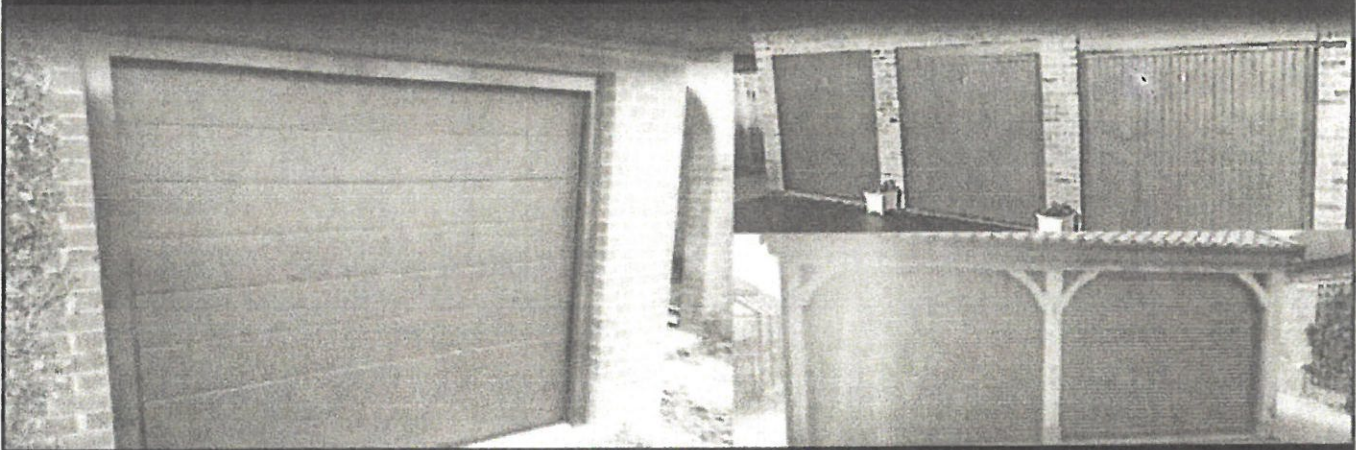
On seeing the police, they drove off through wildlife conservation areas and, after a short pursuit through the village, drove onto another field before stopping.

All four were interviewed and previous poaching convictions were revealed.

The vehicle was seized and the men were ordered to leave the county.

They all pleaded guilty to daytime trespass in pursuit of game (poaching) at Cambridge Magistrates' Court.

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Hackney Carriage & Private hire Policy Consultation

After being invited to comment on the new Hackney Carriage & Private hire Policy, I would like to do so under the council's assurance it will take into account "concerns from the trade". However, assurances are one thing, unfortunately, history appears to reveal how concerns from the trade are largely ignored and/or dismissed (see below **Lack of Confidence**)

Royal have been operating for 54 years and today our predominate business is undertaking contracted SEN services for the CCC. However, when our company was created it was in fact HDC contracts we operated. Consequently, when over 30 years ago legislation required operators to be licenced, our business, vehicles and drivers were also registered with HDC.

Previously having over seventy vehicles (32 being specialist wheel chair adapted) we now only have fifty five with 42 Drivers. Below are our concerns that I might add are having a slow but catastrophic effect on our business.

Private Hire Knowledge Test

1. Unnecessary

We are all aware the original knowledge test was for Hackney Carriage drivers who can legally be flagged down. Consequently, due to the immediate nature of the journey there existed a need for the driver to have advance "knowledge" of any potential route.

The first knowledge test was originally formed in 1884. Let's put that in perspective, this was two years before Kari Benz patented the first car and in the age of the horse and carriage!

The advancement of navigation technology is generating arguments how the knowledge test as a whole is redundant and antiquated for even Hackney Carriage drivers.

However, as we are also all aware, the law dictates "private hire" jobs have to be booked in advance, giving the company/driver time to plan their routes. So, for over 135 years the law and the system itself deemed a knowledge test unnecessary for private hire drivers.

So why, at a time the whole concept is under question for being outdated and unnecessary, and the practicality of the law making it pointless for private hire drivers for the last 135 years, is the council forcing us back to a time of the horse and cart?

Rather than a motive as to "public safety and best practice", a motive of administrative convenience for council personnel seems apparent here, unfortunately, much to the detriment of "concerns of the trade" & "consideration of local circumstances", as outlined below.

2. Lack of Drivers

We have all recently experienced what seemed like the immediate effect the lack of Tanker drivers had at the fuel pumps. However, it was not immediate, for some time the trade had been warning government as to what they regarded as a "perfect storm" developing.¹

¹ <https://www.bbc.co.uk/news/uk-england-gloucestershire-58006669>

Likewise, we have been warning the HDC as to the problem we (and others) are having employing drivers since implementing the knowledge test on private hire drivers.

Rather than district, contracts are now administrated at County level, and as such are not limited to Huntingdonshire. Consequently, and for practicality issues most of our drivers live outside Huntingdonshire.

All but two driver applicants have refused to take the knowledge test. Not living in the area, they are not confident of passing, a number have even stated "if I wanted to become a hackney carriage driver, I would apply to be one".

Two have taken the test, one passed (Lived in Huntingdon for 20 years) the other failed three times at a combined cost of £165. We will have to recover that cost which will simply make us uncompetitive, but even if we win contracts these unnecessary expenses will still come from the public purse.

3. "Consideration of local circumstances"

As with HGV drivers there exists a palpable lack of drivers available to cover County home to school and SEN transport contracts in Cambridgeshire.

This is demonstrated by the same contracts repeatedly being put out for tender. This also means there are a number of children unable to get to school and are being forced to stay at home.

Unfortunately, when I have attempted to advise the HDC of this issue I receive an attitude of "not our problem". When I have asked the CCC to contact HDC they also report a lack of cooperation.

The CCC issues contracts across the County, this includes Huntingdonshire! Surely for a council to adopt the convenient but arguably irresponsible strategy of "not our problem" is to deny the truth, that these issues will also be affecting families and children in Huntingdonshire.

4. Lack of Confidence

We are not for one minute attempting to assign the entire lack of drivers across Cambridgeshire to the HDC decision to inflict on us an unnecessary test. However, I could certainly have taken on several new drivers without it. There are other companies telling me the same.

Unfortunately, these companies will not write to you, why, simple, lack of confidence. Look at the FACT Community Transport scandal.

We and others rubbed evidence of fraud, false accounting, unlicenced vehicles, forged documents and much more in the faces of both district and county councils and for years, and repeatedly ignored and dismissed.

Only when we paid a professional investigation company to produce the Woodcote report and made it public where our concerns taken seriously. Consequently, if the clear abuse of hundreds of thousands of pounds of the public purse was ignored how can we have any confidence the concerns presented here will be treated any differently? So far, they have not!

5. Change Councils

It has been suggested "if we don't like it go elsewhere" basically change councils. This is impossible. The only time you could even consider such an enterprise would be during the six-week school holidays.

I have been running this business for over 50 years, anyone who would claim re-licencing a fleet of 50 drivers and vehicles within six weeks is possible is quite simply deluded, can't be done. And that's before we even consider the expense!

5 Year Restriction on Wheel Chair Vehicles

We would also like a consideration be made regarding the 5 years age restriction on wheel chair assessable vehicles to be lengthened.

Cars, eight seaters and even minibuses are different as five-year-old versions can be obtained for reasonable money. However, minibuses specifically designed to carry wheelchairs are very expensive.

Such expense simply cannot be recovered through the value of the contracts. Consequently, this could result in more older vehicles on the road as some operators may be tempted to hold onto vehicles longer than they would previously.

Conclusion

We have never been given a good reason as to why the apparent unnecessary knowledge test, is after 135 years, being inflicted on private hire drivers. Or why an additional licence limited to only undertaking school contracts can't be created! Consequently, we can only presume it's a case of administrative convenience.

Now, we thoroughly understand how it is very convenient for the council to adopt one size fits all policies. However, in the real-world life can't always be conveniently placed in tidy boxes.

Consequently, we believe irrespective of what reason the council gives for implementing such polices, we are entitled to ask, at what expense is this convenience to be had? Unnecessary financial costs to the public, people's safety, children left at home without school transport or perhaps the slow collapse of an otherwise thriving fifty-year-old business!

Catherine Sandells

From: Licensing (HDC)
Sent: 11 October 2021 11:12
To: rayalcoaches@gmail.com
Cc: Licensing (HDC); Catherine Sandells
Subject: RE: Policy Consultation

Dear Ms Robinson

Thank you for your recent letter that will be put for consideration by members when determining the revised Licensing Policy.

There were however some points raised that I would like to respond to in advance.

1. Knowledge test

The knowledge test, as explained previously, is not a point A to point B test of a persons knowledge of the area, it is in fact a more detailed competency test covering understanding written English, basic maths, legislation, licensing conditions and points of interest including educational establishments. There are in fact no questions asking for the most direct route between point a & point B as is the case with a typical outdated knowledge test as you refer to.

The advancement of navigation technology is a key factor why we have developed the test in the current format, As previously discussed with your representatives we have listened and now put a link on our website to demonstrate some of the typical questions :- <https://www.huntingdonshire.gov.uk/licensing/taxis-private-hire/become-a-taxi-driver/>

All authorities around Cambridgeshire and the majority of authorities nationally have a knowledge and competency test tailored to there local area, in place

Lack of drivers.

I am afraid I cannot support this claim, whilst Covid has had an effect on new applications due to a number of reasons beyond either our or your control, we have approximately 1000 licensed drivers and a steady stream of new applications being processed.

County Council contracts.

Huntingdonshire District Council process all applications for drivers to be licensed under the Local Government (miscellaneous provisions) Act 1976 Part II, this is the main piece of legislation relating to licensed drivers. However Drivers working under an arrangement to transport children may be working in 'regulated activity' as defined by the [Safeguarding Vulnerable Groups Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/24) . The guidance for County Council's on home-to-school travel and transport issued by the Department for Education [Home-to-school travel and transport - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/Home-to-school-travel-and-transport-GOV.UK.pdf) should be considered alongside this document. Therefore County Council are entirely at liberty to impose rules above or different to those required to obtain a licence with HDC when issuing contracts.

Consideration of local circumstances

As I have previously stated HDC dos not nor has any influence directly or indirectly on how Cambridgeshire County Council organises its school contracts or any pre requirements they put in place when awarding any contract. Your statement is fundamentally incorrect. HDC processes driver licences under the Local Government (miscellaneous provisions) Act 1976 partII, we are unable to dictate to County Council how they interpret their own legislation, safeguarding vulnerable groups act 2006, or any standards they wish to set for issuing school transport contracts.

However we do cooperate with Schools transport team on a regular basis when compliance issues arise, I do not believe that there is a lack of cooperation.

Lack of confidence

HDC has considered the need for a knowledge and competency test and will review it as part of this consultation, your comments will be taken into consideration.

With respect to "Rubbed evidence of fraud, unlicensed drivers etc" to the best of my knowledge this is not something you have previously presented me with evidence of, but I can assure you that any alleged issues that are presented to ourselves are investigated and would encourage all licensees to make us aware of any such matters.

You refer to the "woodcote report" I am afraid I am not aware of this but would be happy to receive a copy to understand the relevance it has on the licensing processes undertaken by HDC

Change Councils

If I or any of my team have said this I would suggest it has been taken out of context, but I apologise for any misunderstanding it may have caused. The fact is that any driver, operator or vehicle proprietor can licence, subject to their local conditions, with other authorities. A number of operators are licensed across more than one authority to give themselves maximum flexibility but still abide by legislative requirements and provided the trilogy of licenses (for a booking or contract the driver, vehicle and operator must all be licensed by the same authority, unless subcontracted to another operator who then must comply with the trilogy of licensing) are adhered to then being licensed elsewhere is a decision for yourself or any operator

5Yr restriction on wheelchair accessible vehicles.

The current conditions do allow for hybrid vehicles to be licensed up to 7yrs of age, but I am sure that members will consider this point carefully in respect to minibuses converted to carry 8 passengers or less

Conclusion

Legislation is clear that there is no legal provision for a "schools contract only" driver licence, there is simply a Hackney Carriage and Private Hire driver licences. Until new primary legislation comes into being then this is the current situation, likewise there are only two types of licensed vehicle, a Hackney Carriage and a Private Hire. No separate legal provision has been made for schools. I do not believe it would be lawful to grant a driver licence and then restrict the work they can undertake under that licence.

Once again I appreciate your response and the comments made

Kind Regards

Myles Bebbington
Operational Manager

From: Jan Robinson <rayalcoaches@gmail.com>
Sent: 01 October 2021 12:57
To: Licensing (HDC) <Licensing@huntingdonshire.gov.uk>
Subject: Policy Consultation

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

My letter attaches many thanks Jan Robinson Ray-Al Coaches Lts

Catherine Sandells

To: Licensing (HDC)
Subject: RE: REVIEW OF TAXI LICENSING

From: margaret_king@sky.com <margaret_king@sky.com>
Sent: 21 July 2021 14:16
To: Licensing (HDC) <Licensing@huntingdonshire.gov.uk>
Subject: REVIEW OF TAXI LICENSING

Dear Sirs,

My comment is that stronger action should be taken to impress upon taxi companies that parking and speed legislation applies just as much to them as other citizens.

M. King

Catherine Sandells

Subject: FW: Feedback for consultation

From: Hunts Taxis <info.huntstaxis@gmail.com>
Sent: 29 August 2021 11:29
To: Licensing (HDC) <Licensing@huntingdonshire.gov.uk>
Subject: Feedback for consultation

Good morning.

I have a few points I would like to give my opinion on.

First point I would like to address is new drivers. We have over the last year struggling to get new drivers. The few we do put forward end up giving up due to how difficult it is to now obtain a license. I am fearful that if this carries on we will one day have no drivers at all. Now this is a surprise especially when we have the demand. So those who don't have transport and rely on taxis to go to hospitals shopping centres schools. Not all taxi users use taxis for social purposes some people would lost without taxis.

Second point is bolt and Uber. Now with no new drivers these companies will only put local firms out of business and take the drivers. I would like assurance that this will not be the case in Huntingdon and that licensing team will safeguard us small firms against these giant corporations.

My last point I would like to make is that I don't think it's fair to treat drivers like criminals when made a mistake of not informing the council of penalty points. I think for a driver who's had a clean license and has penalty points Dvla don't just request the license to be handed back. They have points system and so should you.

With all the above it's looking very dark and depressing going forward. I hope we can change this and see light at the end of the tunnel.

Please make it possible for new drivers to pass tests as we can not fulfil the demand of our customers due to lack of drivers.

Please stop bolt and Uber by not granting them licence as we already have more than enough operators and all have the same issues with lack of drivers.

Please review your disciplinary action against information not provided at a certain time. Instead give drivers the benefit of doubt.

Kind regards Mr Nazir

--

Kind Regards,

HUNTS TAXIS LTD
01480 414500
Unit 33 Upland Industrial Estate, Wyton, Huntingdon PE28 2JZ
<https://huntstaxis.co.uk>

Catherine Sandells

Subject: FW: POINTS FOR CONSULTATION -DRAFT HACKNEY + PRIVATE HIRE POLICY

From: Cachet Cars Ltd - Bookings <bookings@cachetcars.com>

Sent: 10 October 2021 22:04

To: Licensing (HDC) <Licensing@huntingdonshire.gov.uk>

Subject: POINTS FOR CONSULTATION -DRAFT HACKNEY + PRIVATE HIRE POLICY

FAO – Licensing Department, re Consultations Responses

Having read, and read again the detail the draft policy, please find below a few comments I would like to submit.

HDC Signage, plates

Will this be on cars who have discreet exemption plate rules? .Clients book our executive chauffeur service for the reason we have no signage. Just last week we chauffeured 'Lord Andrew Llyod Webber', as he was only to travel in a discrete plated luxury chauffeur car

Age Policy

Should there not be an upper age limit in the cars? Safety features of cars that are over 10+years old will not be as good as modern ones?

Safety Equipment

Cars carrying extra medical equipment is welcomed by anyone if appropriate. However, a Automated External Defibrillator (AED) controlled via ipad/iphone is very serious piece of equipment. Does the PH driver and/or /operator not need to update licensing? Where are annual safety checks for such a major piece of live saving medical equipment? The PH driver must be fully trained, who checks this? God forbid the AED is ever need, but if tragically a loss of life is shown because of faulty equipment/non maintained equipment or lack of training by another PH driver who is liable for allowing it to be carried in a PH licensed car? First aid kits cannot be moved vehicle to vehicle, yet an AED might be?. An out-of-date plaster/first aid kit can result in compliance test failure, but such major pieces of medical equipment are allowed with no similar checks when undertaking work inn enhanced PH tested vehicle.

Maintenance of vehicles

I would welcome twice year testing to ensure the safety of all clients

Vehicle testing

When cars fail the Compliance test, can the vehicle licence plate not be removed by the test centre - there are cars that fail yet carry on operating

Private hire exemption to display licence plate etc

Executive vehicles – A basic Audi A6, BMW 3 series, VW Passats or VW Caravels are NOT executive cars, yet many are operating as exempt plated and promoted as an executive service.

Furthermore, these standard car/mpv models in some cases are also undertaking school runs for the local authority, courier/amazon delivery, to use for a cleaning company and normal day to day work. These are NOT what an executive fleet needing plate hire exemption do.

Local knowledge and Competency test.

For chauffeur executive hire is this still required? Nearly all our pre booked work is to/from airports, Long distance luxury travel outside the local area after pick up from a company business address or private residence address. We are not a regular taxi company that would need such regular detail or day to day knowledge for new drivers? Could this be considered as not required when we sponsor a new driver applications ??

Section 5 - Operators General

There seems to be a noticeable number of cars with Wolverhampton license operating in our HDC boundary. How is this the case?

Thank you for taking the time to read this

Regards
Jayne

Jayne Beaumont | Managing Director



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Catherine Sandells

Subject: FW: Hackney Carriage Policy Review.

-----Original Message-----

From: Joseph Parsons <joerct1@gmail.com>

Sent: 20 July 2021 12:00

To: Licensing (HDC) <Licensing@huntingdonshire.gov.uk>

Subject: Hackney Carriage Policy Review.

Good morning,

I wish to make the following comment on the draft policy consultation.

Section 4, paragraph 42 - Local Knowledge Test. I believe it is unnecessary for a Hackney Carriage Driver to undergo the test when they are employed solely as a single route driver. Perhaps licences could be annotated as such. A driver who is employed solely to collect and deliver children to school on a daily basis does not need to know local landmarks. This makes it harder for operators to employ drivers for these routes.

Thank you for giving me the opportunity to comment on this matter.

Joseph Parsons

Catherine Sandells

From: Richard Vanbergen <richard@flex-able.co.uk>
Sent: 07 October 2021 10:09
To: Myles Bebbington
Subject: Draft consultation
Attachments: We sent you safe versions of your files; HDC Consultation 2.pdf

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Good morning Mr Bebbington

I have enclosed a document for your perusal re HDC's draft consultation on Private Hire Policy
I hope it contributes to your project

Kind regards

Richard Vanbergen



Richard Vanbergen

Managing Director

FlexEservices Ltd

Unit 11, Levellers Lane, St. Neots, Cambridgeshire, PE19 2JL
Telephone : 01480 890200

Website : www.flexeservices.co.uk



@flexeservices for facility services
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Discrete Plate

As you are aware we have exemption from displaying plates because of the type of work we offer to our corporate customers. This includes the CPS, witness care program, Local research companies and senior government officials via their authorised logistics company.

However, we had an "incident" if you could call it that, whereby a passenger who appeared to know the "rules" demanded to know why we were not displaying our plates. We explained our reasons why and this appeared to pacify him. Almost all our large corporates insist in having copies of my Ops Licence, and insurance etc including a list of the vehicles we operate, this, for their compliancy.

I know from the early days a "plate" was displayed and in recent times there have been a request that all private hire and taxi companies that are not exempt from the "discrete plate" rules, must display in addition to the rear plate, on the rear side doors on both sides of the vehicle's half moon licence plates. I understand the reasoning for this for the safety and security of passengers.

However, I have given quite a lot of thought about this. Currently we display the little yellow decal in the front left side window. Why not on the rear of the car a mini plate possibly positioned by the number plate or in the rear window. I have enclosed an idea for your perusal



First Aid kits

There is no guidance as what should be in the first aid kits. I asked our First Aid Trainer to work out what should be in the first aid kits as far as licenced vehicles are concerned.

He has suggested this :

Car/Travel First Aid Kits

- 1 Guidance Notes
- 10 Assorted Plasters
- 6 Safety Pins
- 1 Large Dressing
- 1 Pair of Gloves
- 2 Alcohol Free Wipes
- 1 Triangular Bandage (non-woven)

What are your thoughts on this? So a minimum standard can be agreed please.

Maximum age for vehicles

I think in my last contribution some 4 years ago when the council sought ideas and opportunities to “beef up” the private hire/hackney licencing laws I did suggest that, no vehicle over 5 years of registration should be initially licensed (Which you do now) and that any car over the age of 12 should be not working in the licenced business and maybe premium vehicles, ie Mercedes, Audis’, VW etc to 15 years. I have seen some vehicles licensed with HDC that are 16/17 years old. If I’m having problems with high end cars at 6/7 years, just how are those vehicles managing to pass what is quite a stringent test?

Electric vehicles

I have no idea how many electric vehicles are currently licenced with HDC. I can’t imagine it’s many. How will the current testing station cope for the MOT’s etc. the vehicle dynamics are very different as well as, as far as I can see the batteries, in time will be a problem. The weight ratios of these cars represent a different drive process, again over time. What contingencies as far as policy is concerned has HDC in place? My reasoning here is because by 2030 I would hazard a guess that 50% of the licenced fleet will be electric cars and if there is a simple change in policy, that could affect what we have on the fleet.

Whilst I accept that EV’s are new to licencing and of course to regulation will there be any clarification about their use? I think the extended MOT might surface some new problems which at this moment in time we are not expecting.

Medicals

An issue we had about 3 years ago is when we employed a driver, who passed all her physical medicals etc, but we later found out that the driver, in our opinion had severe mental issues which would not surface in a normal private hire medical. Is there a way the medicals can be modified to account for this issue. At the time I did report this and terminated the employment of the said person.

Application, knowledge & Englishness test

Until recently I did not know that an applicant had to undertake a "local knowledge test". Looking at the example on the HDC website, I would have to admit I had no idea where that school was. I have to accept that the council have to have high standards for the principal reason of upholding safety and security of passengers.

When I originally applied for my licence in 1997 Mr Frampton took me out and his objective was to make sure I was a safe driver and to a lesser degree a basic knowledge of Huntingdon. I did explain to Mr Frampton that a trip to the Lord Protector was not on my agenda and if I had to collect someone from there I would hand back my licence. (We do not undertake pub or club work and never have). I assumed that the Blue lamp test covered the driver ability that as a licensing department you require. I am looking to employ a retired police officer who lives in Alconbury, but her "patch" was Hertfordshire. Until recently she had no idea where the Old Bridge Hotel was, even after living in Alconbury for 10 years. Now that I know what your requirement is we will give her some basic "knowledge training in and around the three county towns, namely, St Ives, St Neots and Huntingdon. But my point here is, what about the rest of the district?

Operators Licence and base of operations

When I applied for my operators licence with my one car in 1997 I was renting an office out in Huntingdon. I moved to my house, now with my 2 cars and then to a unit in Alconbury, where Steves originally started and set up. This from 2003 to 2009 and we had something like at the time 20 operational vehicles. We then moved to a very large unit in St Ives and now we are based in St Neots, again out of an industrial unit.

My point here is, what is the criteria for an Operator to work out of?

Clearly, I could not move back to my office in my house, even with 12 cars we have currently licensed. Although drivers tend to take them home because of the logistics of the work we give them. Steves appear to work from shops, ie the ones I see in St Neots and Huntingdon. As for the other operators, especially ones with 3 or more cars, where do they work out of?

I want to rent an office in Huntingdon, but store my cars under licence on the Alconbury air base, is that permissible. I understand the responsibilities of an Operator, but the practicalities of managing such a fleet do not appear in the "operators rule book".

MOT & Car maintenance

As you are aware we have had some local difficulty with the MOT testing station at Adams. I fully accept that it is impracticable that if something very minor fails the test, is there a process or way that whatever the problem is that it can be rectified quickly without the need of going through another expensive test as well as a vehicle falling out of the 5 year rule, which could easily happen. I accept if there is an "advisory" some operators would not comply with the rectification, but that seems to tar all the operators with the "same brush". Surely Adams could work a system of some sorts to help. It does appear to be quite arbitrary and surely the test station could be a little more helpful.