



Also sent to:  
Leader of the Council  
Head of Legal  
Head of Licensing  
Licensing Committee Chairman

59 Beaufort Road  
Upper Cambourne  
Cambridge  
CB23 6FP

27 November 2019

Cllr Douglas de Lacey (Chairman Of Council)

I was very surprised after reading the proposed policy  
Ref: Report to Licence committee on 11 November 2019  
from the Council Subcommittee -Meeting regarding the Taxi/Private Hire consultation  
that a since end of Consultation (Late September) there has been some significant  
major changes to policy added.

I was on the understanding that the consultation period was a time for putting  
forward changes to the trade and by scdc licencing sub-committee, to give us as a  
trade to consultate on the new proposals.

Some of the new changes that removed/added have been added which could cause  
major financial impact on many small businesses.

1. For example since consultation ended to the 10 Mile rule has been completely  
removed for Scdc Operators who are based outside of Scdc area but within the  
current policy 10 mile rule regulation.  
Although this doesn't directly impact our business as im located inside south cambs I  
work along side and sub-contract to other Scdc operators it will. So therefore will in  
directly effect and impact me as a small business.

This will no doubt Cause other operators scdc great expense they haven't planned  
for as no prior warning has been given or any written notification has been sent prior  
to the new policy before full council.

I can see why you may want to add this on new applications, but to penalise your  
existing customers who have set up substantial businesses for something you  
allowed in the past with no prior warning seems rather unfair.

At the very least you should review this issue at the least give them some time into  
restructuring relocating their businesses plan accordingly.

This was advised on the recommendation of the Scdc enforcement officer of a 1  
year grace period for all new renewal that this affects at time of renewal  
This recommendation has been totally ignored by the licencing team/ committee

2. The introduction of drivers having their licence revoked once they have exceeding  
6 points (ie 7 or more) appears to be extremely harsh

Although I understand that the main focus is on safety and professionalism Due to previously being 9 points in current policy.  
This also wasn't in consultation.

3. When have had engagement during the consultation period and after with Scdc regarding our main issue of CCTV being fitted to all Private hire vehicles, including plate exempt vehicles.

We were also asked during our engagement with Scdc for written proof from our accounts/Clients (Which we submitted around 40 from separate businesses) stating that this is something that is not wanted due to very delicate and discrete conversations being held in the car.

This has been ignored completely and needs further discussion as there is a big risk for our sector of losing business.

4. The removal of forward and rear facing dash cams which are mainly been asked for our insurance companies in the new policy.

By the removal of these stand to have a financial impact from insurance companies in my opinion.

Also an financial impact for removal costs and cancellation fees from insurance companies and new set up fees.

5. Hackney carriage and Private Hire handbook that has been mentioned through the consultation period has not been available.

Just to finalise I feel it would be totally un reasonable to approve this policy at full council on 28<sup>th</sup> November 2019 until further consultation has been discussed on the issues stated above.

Small businesses clients and livelihoods are dependent on decisions on the outcome of your decision with full council.

I therefore hope you will consider these points and further discuss with the trade for a new consultation.

Yours Sincerely

Rob Chapman