

From: Steven Leech <info@slexecutive.co.uk>

Response 1

Sent: 16 April 2021 06:50

To: Licensing <Licensing@uttlesford.gov.uk>

Subject: [External] Fwd: Consultation plate exemption

Dear Sir/Madam,

- 1) Providing a chauffeur service using executive cars for clients who are willing to pay for a high end service. The destination should not be an important factor in determining plate exemption.
- 2) Business clients booking chauffeurs for meetings, airport transfers, corporate hospitality days out are just mentioning a few. If someone is celebrating a special birthday or anniversary and are going to a London hotel or restaurant they are usually going to want a special car to mark the occasion and made to feel special with a chauffeur opening doors and giving a sightseeing tour. Proms the cars booked again for a special occasion and are usually Mercedes, Bentley's and Rolls Royces. People want an un-marked car as a plate appears like a taxi.
- 3) The clear and visible identification of a licensed vehicle is considered a safety aspect, particularly when visiting such places as airports, seaports and large town or city centres. Therefore the overriding consideration when determining any request for an exemption will be the impact on public safety?

The above statement refers more to taxi's and not private hire high end chauffeur companies. Clients, all work is pre-booked and the clients are passed on the drivers mobile and car registration before the day of travel. If a client is going to an airport they get in the car from their home or business address usually. Clients like to travel in unmarked cars for their security.

Another point is the car becomes a target to break in's if parked in London with a council plate visible as your making the car a target to criminals if a client has been shopping in Gucci or Cartier for an example.

If we are meeting clients at airports we meet inside the terminal to greet.

The safety aspect of having a council plate displayed may only be beneficial if car hire companies were registered with apps such as Uber. Even in London when we are waiting for our clients we watch individuals looking at the car registration that it matches their phone if they are using a Uber car. (We do not sign up for this service) usually Prius car is popular with a casually dressed driver. No suit or tie.

- 4) Chauffeur companies such as mine operating now for 16 years and have always been plate exempt could loose bookings from existing clients and new as displaying a council plate may have a detrimental effect upon an operating business as some corporate customers may be deterred from using the service.
- 5) identification of a vehicle as a licensed private hire vehicle could allow "high risk" passengers to be more readily targeted, resulting in a placing of the safety of both the passenger/s and the driver at risk.
- 6) Current exemption letter & policy states plate exemption for the life of the vehicle licence unless revoked so we shouldn't find ourselves having to provide lots of additional information at renewal.
- 7) When operating several Mercedes S-class limousines the client doesn't book an exact registration so the fleet of S-class cars should be given exemption when applied. Clients are CEO's, Managing directors or owners of their companies. They do not want to be bothered with forms to sign for each vehicle. They use our service as we provide a high end chauffeur service and some clients have been with us since we were established 16 years ago.
- 8) I was given this by Uttlesford council for each car so this should not be taken away or need to be applied for again. The exemption once granted shall, unless revoked or surrendered, continue for the duration of the private hire vehicle licence. This is considered to be up to and including the expiry date listed on the licence plate.

9) A choice of Executive cars for CEO's article on link below;

<https://www.business.com/articles/the-top-10-cars-for-ceos/>

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Kind regards

Steve Leech

www.slexecutive.co.uk

Tel; 01279944037

Tel; 01621893409

Mob; 07766570973

From: barrydcp@aol.com <barrydcp@aol.com>

Response 2

Sent: 18 April 2021 22:02

To: Russell Way <RWay@uttlesford.gov.uk>; Licensing <Licensing@uttlesford.gov.uk>

Cc: douglasperry4@hotmail.co.uk; uloda@go-blt.co.uk; dannietaxi@yahoo.com; kevincordall60@gmail.com; ryan_cordall_1@hotmail.com

Subject: [External] ULODA response to UDC consultation on PHV plate exemption guidance (closes at midnight 18 April)

Dear Mr Way

We appreciate the invitation to submit comments in response to the consultation on plate exemption guidance.

As acknowledged trade representatives, ULODA have generally been supportive of UDC's best practice, and always prepared to add critical value to new Licensing Policy and its application.

Background

The existing policy was first introduced some years ago via a focus group of invited proprietors/operators and drivers and ULODA (Richard attended) facilitated by the then Lead Licensing Officer.

All those affected were entitled to have their say and it is good to note that everybody is being consulted now in the spirit of working in partnership, given the increased focus on public and driver safety.

Extracts from the existing policy include the following points:

1. "UDC recognises that there is a specialist market for the use of unmarked vehicles" (5.2)

This has been a helpful generic definition in use for over 20 years by UDC. A UDC signed letter granting exemption listed companies requiring contracted work to be done by unmarked vehicles.

2. "Exemptions once granted shall, unless revoked or surrendered, continue for as long as the proprietor licenses [it] as a private hire vehicle." (5.6)

The letter (or notice as specified in the legislation) was kept in the vehicle (boot or glove compartment) throughout the life of the licence. This has saved administration time and cost

3. The vehicle "shall only be used for executive work or such other work as shall have previously agreed in writing by the Council" (5.7.4)

One of the issues for enforcement and compliance purposes is a lack of really clear definition - "executive work," for example, may not cover all contracted work requiring unmarked vehicles. ("Corporate customers" in the proposed guidance is another area lacking definition.) Celebrities and public servants such as mayors and government officials are known to be passengers carried safely in such exempt vehicles owned by UDC licensed operators. We recommend that such passenger classifications should be specified in the policy and/or in the certificate of exemption.

There seems to have been little or no thought given recently to an established proprietor facing for the first time provisional new Council requirements on applying for a vehicle plate exemption. A complaint was drafted and submitted to UDC's new Licensing Manager, who used his delegated authority to reverse his previous decision not to grant the exemption.

The proposed new guidance thankfully seems to address some of the treatment he received by making the application process less onerous (e.g. 3 months' booking record required, rather than 12 months').

Legislation

LG(MP)A 1976, s 75(3): "an exemption from the requirement to display a plate needs to be in writing: while the notice (aka certificate) is carried in the vehicle (boot). [Also,] s 54(2) shall not apply to the driver. Such a notice removes the need to display a plate and also dispenses with the requirement that the driver should wear his "badge in such a position or manner as to be plainly and distinctly visible".

For the avoidance of doubt, it may be helpful if all references in the guidance to sections in the legislation specify individual sections. Drivers are expected to know the law! Such references will help their understanding, for example, of the fact that they "must be in possession of their badge at all times". It is recommended that in plate

exempt vehicles the badge should be visibly displayed on the vehicle centre console for ease of identification and for security reasons.

Such relaxation of requirements is often allied to a condition restricting the use of the vehicle, although such definitions have not always been easy to determine. The objective is to enable these vehicles to be used for their more selective purpose, and avoid them being used in situations where the absence of identification features might cause problems (such as late night city or town centre or special event use), with the vehicle not being seen by the intended passenger or by allowing unlicensed vehicles to masquerade as licensed "executive" vehicles.

There is no definition of "executive" vehicle in the legislation. The existing policy (5.5) helpfully references "executive/prestige/high end vehicles such as Mercedes Benz S Class, E Class, V Class and Viano, BMW 5 and 7 Series, Jaguar, Rolls Royce, Bentley, Lexus, Audi 6 and 8, Tesla or other similar types of vehicles". This has been helpful to Licensing, proprietors and drivers in setting standards, but seems not to have been taken forward into the proposed guidance?

Proposed New Guidance

The proposed changes also seek to address the potential detrimental effect upon an operating business "as some corporate customers may be deterred from using the service" if an external identification plate is displayed (the silent definition of "corporate customers" may be unhelpful). As suggested, there may be legitimate circumstances where the identification of a vehicle as a licensed PHV could allow "high risk" passengers to be more readily targeted.

In order to reduce passenger vulnerability, some local authorities require unmarked vehicles to use a discreet front windscreen disc (displayed like the old RFL) in place of a licence plate to assist with identification at the pick up point and this should be considered as an example of best practice for use by UDC Licensing.

ULODA has members whose business has been focused exclusively on the specialist market for "executive/prestige/high end unmarked vehicles". Proprietors granted plate exemptions for their vehicles should be treated as exceptions in any policy which specifies that "each request shall be considered on its own merits": they should not be required to complete onerous applications for each individual vehicle renewal. Such a service is often provided by one of several vehicles owned or used by the proprietor, and contracted passengers should not have to sign an individual vehicle document each time they use one.

This matter may be addressed by a confidential file note agreed between Licensing and the vehicle proprietor, with limited access available to those with a need to know (such as Compliance).

Finally, the proposals also cover the introduction of door signage for private hire vehicles: there is a reference to "...the requirement to display other signage as ordinarily required by the Council". We are assuming that any granted certificate of exemption will also apply to such other signage. At a recent focus group meeting with the Licensing Manager, there was a suggestion from ULODA that such other signage should be capable of being displayed with a magnetised backing to make it easy to remove when not in use.

We hope that these points will be considered carefully towards the development of UDC's revised Licensing Policy.

Yours sincerely

Doug Perry	Barry Drinkwater	Richard Ellis	Dannie Westbury-Barnes	Kevin
Cordall	Ryan Cordall			
Hon President, ULODA	Chair, ULODA	Vice Chair, ULODA	Hon Secretary,	
ULODA	Executive Member, ULODA	Communications Officer, ULODA		

16 April 2021

E & O E.

From: graham anderson <graham.anderson@execschoice.com>

Sent: 30 March 2021 16:23

To: Licensing <Licensing@uttlesford.gov.uk>

Subject: [External] Response to UDC document regarding Licence plate display exemptions

Good Afternoon,

Thank you for circulating the above document for review.

Having read the document, I make the following observations:

- 1) Is the plan for the exemption certificate to last for the life of the vehicle (as current in the same operators hands) or is a yearly renewal?
- 2) Will current exemption certificates be grandfathered into any new process?
- 3) Will Licensing work to a published timetable for the issuance of a new certificate or,
- 4) Is it possible to issue a temporary exemption (say for a week). The reason for me asking this question is that on many occasions a new client could come onboard within a very short timeframe and have an exemption requirement.
- 5) What data is Licencing looking for with regard to booking records?
- 6) It is not often that a “contract” is in place with clients. I presume a letter / email on headed notepaper provides sufficient evidence?
- 7) What fee is Licencing look to apply to the new process?
- 8) Suggest changing the words “Police constable” to “Police officer”.

Kind Regards,

Graham.

Graham Anderson

Managing Director

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From: quinton@stanstedairportcabs.com <quinton@stanstedairportcabs.com>

Sent: 28 March 2021 21:19

To: Licensing <Licensing@uttlesford.gov.uk>

Subject: [External] Plate Exemption Review

Dear Licensing,

I'd like to put my thoughts forward on the plate exemption.

Having read through it all makes sense, however, it would be greatly helpful if plates that need to be shown could have 'temporary' fixation which does not require drilling/damaging the vehicle.

At times the vehicle will be used outside of Private Hire, it should be easy and straight forward to take plates off the vehicle without damage.

I have an E Class Mercedes, and displaying the current plate requires damaging the vehicle, there needs to be a way to fix plates without car damage.

Unless there already is a solution that I'm not aware of??

Kind regards,

Quinton Smith | Director | Stansted Airport Cabs Limited

t. +44 (0) 734 001 1110 |

e. quinton@stanstedairportcabs.com

From: Green Sky Executive <info@green-sky-executive.co.uk>

Sent: 26 March 2021 16:53

To: Licensing <Licensing@uttlesford.gov.uk>; Microsoft Outlook <info@green-sky-executive.co.uk>; Paul Tuthill <paul@green-sky-executive.co.uk>

Subject: [External] Vehicle Plate Exemption

Hi Russ,

Good afternoon and I hope this email finds you well?

Further to your request on feedback regarding the Plate exemption please see my comments below.

Private hire companies that offer a executive offer should be able to apply for vehicle exemptions as is currently. For me we are a new company but I am sure any more established company would also need to have this offering to hand. I, as I am sure most company owners would agree, will always be looking for new business and cars do not run in most circumstances everyday with "High risk" clients but a call could come through at anytime. If we have to contact the licensing department each time this will ultimately cause confusion for both operator and within your team. When spending in excess of £50k upwards too £100k (if not more on the rare occasion) on a vehicle, you are really not offering a "normal" taxi service.

Can I suggest what is used by TFL? I would have no problem placing a discreet sticker within the inside rear window however the big square yellow badge really is not appropriate when operating this kind of service and vehicle.

I hope you find this an adequate view and look forward to hearing the outcome of the process.

Kind regards

Paul

Paul Tuthill
Green Sky Executive
07852774158

Response 6

From: Freddie Spall <freddies.taxi@gmail.com>
Sent: 23 March 2021 12:44
To: Licensing <Licensing@uttlesford.gov.uk>
Subject: [External] Fwd: Executive hire debate

Thank You.
Freddie's Taxi

----- Forwarded message -----

From: **Freddie Spall** <freddies.taxi@gmail.com>
Date: Tue, 23 Mar 2021, 12:32
Subject: Executive hire debate
To: <licencing@uttlesford.gov.uk>

Hello

With the debate on executive hire. I think the executive hire should stay & be made easier to apply . Because it gives the drivers business more ways & opportunity to be able to make a living by taking it away you make it even harder to be able to make a living its hard enough out there to earn a living

Thank You.
Freddie's Taxi

Response 7

From: PAUL SWORDS <pswords@247aviationservices.com>

Sent: 19 March 2021 10:31

To: Licensing <Licensing@uttlesford.gov.uk>

Subject: [External] Plate Exemption Review

Dear Sir - Madam

With regards to the Plate Exemption Review we would like to express our wish for this facility to continue , we provide transport services to Cargo air Crew from the USA and China who operate aircraft into and out of Stansted airport .

The crew in question work for some of the biggest companies in the world including UPS and China Southern Airlines who by the very nature are potential targets, we do not want to advertise the fact we are transporting this air crew around and value the ability to not display the plate.

Thank you in advance for your consideration on this matter.

Kind Regards,

Paul Swords
Team Leader

247 Aviation Services Ltd
Mobile: +447815 158302

We ♥ Crew Logistics

247 Aviation Services Ltd. Registered Office: Manufactory House, Bell lane, Hertford, Hertfordshire SG14 1BP. Registered No. in England 10756136