

From:
Sent: 30 July 2014 12:21
To: Taxis;
Subject: RE: Hackney Carriage and Private Hire Policy Consultation
Attachments: Observations consultation review.docx

① Observations Hackney Private Hire consultation review:

Although the policy in principal has worked reasonably well and has provided both "Public" & private passengers a safe and professional means of public transport it still weigh's heavy with over administration.

Hopefully the policy review within the "Light Touch Approach" can streamline administration and continue to provide a high level of public protection and fit for 2015 & remove duplicated levels of protection already provided by central government including VOSA DVLA & medical profession.

② ***Taximeters:***

This section should be changed, as I do not know of any taximeters that use a key capable of locking a meter into position

9.0 Taximeters (b) Such key, flat, or other device shall be capable of being locked in such a position

that the machinery of the taximeter is not in action and that no fare is recorded on

the face of the taximeter;

③ **First Aid kits / Fire extinguisher;**

Both fire extinguisher and first aid kit are for the driver's safety and not of the passengers; it should be the driver's choice if he wants to carry them in the vehicle. Shropshire Fire & Rescue advise drivers NOT to attempt to fight a vehicle fire but to call 999. Drivers should NOT administer first aid unless fully trained.

Note Not sure but hasn't BS (British Standard) been replaced with EN3

8.1 There shall be provided and maintained in the vehicle at all times when it is in use or available for hire a suitable and efficient fire extinguisher complying with the current BS standard and suitable first aid kit complying with the current BS standard, such equipment to be carried in such a position in the vehicle as to be readily visible or in other suitable position, it must be available for immediate use in the event of an emergency.

④

Medicals:

DVLA and the medical profession are ideally suited to address any driving issues regarding fitness to drive so why should the council need to duplicate.

It is age discrimination to make drivers aged over 65 have to take a more frequent medical.

19. Medical Fitness

All drivers are required to undertake a medical examination to ensure their fitness to drive. The standards required are as laid down in the DVLA publication "At a Glance Guide to the Current Medical Standards of Fitness to Drive". The standard required is the "Group 2 Entitlement the DVLA medical standards guidance of fitness to drive". Copies of this document can be obtained from the Council's Licensing Section. No grandfather rights are given by the council in

relation to medical matters.

Applicants would be screened for fitness before a licence is issued and at five yearly

intervals from age 45, or sooner if stipulated by the examining doctor.

Applicants over the age of 65 or who attain the age of 65 during a licensed period

will be required to provide a medical certificate annually.

⑤

Driving Ability tests:

The policy does not require Advanced driving skills but the test is carried out by a Shrewsbury based advanced driving examiner. If the council still consider the requirement for a driving test despite DVLA,s & medical professional's stringent administration of a driving licence, why not allow all approved School of Motoring businesses across the county to provide this diving assessment. Not only would me more cost effective for the trade & the authority but would allow driving instructor's across the county a chance to bid.

⑥

Knowledge tests: The knowledge test at present is little more than a paper exercise and adds very little practical value for passengers or drivers and a revised test should be available at the local office; Knowledge test should be zone specific .

8. All new applicants will be required to take and pass a knowledge test in English

prior to obtaining a licence. New applicants will also be required to take and

pass a driving ability test or hold an advanced motorist qualification.

⑦

Drivers Licences; The council should consider a five year badge to help with costs and consider a "hackney Carriage badge and Private Hire badge as opposed to a joint badge.

⑧

Vehicle tests.

The policy requirement for vehicles over 9 years old to have a MOT test every 16 weeks is far too stringent and goes against best practice guidance.

9

ON DUTY? :

Clarification on what is deemed "ON DUTY "

14. Animals

Whilst on duty the driver shall not convey in a Hackney Carriage or Private Hire

Vehicle any animals belonging to or in the custody of himself or the proprietor or

operator of the vehicle without prior permission of the Licensing Authority. Any

animal belonging to or in the custody of any passenger may be carried at the

driver's discretion. Assistance and guide dogs must be carried when requested

unless the driver holds a medical exemption. Drivers must not impose a charge

for carrying assistance dogs. Assistance dogs may be permitted to travel in the

front of the vehicle.

10

Removal of Zones: The Department for transport recommends the abolition of zones, chiefly for the benefit of the travelling public. Zoning tends to diminish the supply of taxis and the scope for customer choice - for example, Very few taxis operate in North Shropshire but taxis from Oswestry only a few miles down the road from Ellesmere cannot pick up passengers unless pre booked. It can be confusing and frustrating for people wishing to hire a taxi in Ellesmere to find that a vehicle licensed by the relevant local authority is nonetheless unable to pick them up (unless pre-booked) because they are in the wrong part of the local authority area. Abolition of zones can also reduce costs for the local authority, for example through simpler administration and enforcement. It can also promote fuel efficiency, because taxis can pick up a passenger

anywhere in the local authority area, rather than having to return empty to their licensed zone after dropping a passenger in another zone."

11

Vehicle Signage:

A licence plate should be displayed on the Front of the vehicle as well as the back to allow for easy identification to the public.

The policy dictates the size of a taxi roof sign and precise sizes of the lettering does this need to be so stringent;

To simplify can the policy state that taxis should display a roof sign with the words TAXI and illuminated through the meter switch.

5.5 All vehicles are required to display a white roof sign bearing the words TAXI on

the front and rear in uppercase black lettering of a minimum height of 79mm,

width 50mm, stroke width 14mm and spacing between lettering of 11mm. The

sign must be capable of being illuminated and mounted across the roof of the

vehicle (excepting purpose-built taxis). All lighting to comply with current road

vehicle legislation.

12

Door signs. Why less than one week.

3.4 Use of magnetic panels is discouraged for anything other than short term use (less

than one week) as they lack adequate adhesion.

13

What is the definition of an executive style vehicle?

3.6 All vehicles (with the exception of executive style vehicles) will be required to

display Council issued signage on the side of the vehicle. This will carry the

Council logo, PHV licence number and the words 'Prebooked only'.

14 CRB Barring: Shropshire Council should make available the "Online CRB Barring" provision.

15 Convictions:

Removal of item 9. **Convictions – Written Notification.**

As part of the licence conditions, the applicant is asked to disclose all convictions

and cautions. Therefore all convictions must be disclosed, including spent

convictions;

This inclusion breaches confidentiality all relevant information is available within the CRB & Barring document.

16 Licensing staffing levels:

A licensing officer should be available 9 to 5 Monday to Friday in each of the zones to help eliminate the authority's continuing maladministration and provide equality of service across the county.

The Council's aim is to provide a responsive service to the trade and members of

The public at all times during normal office hours.

17 Taxi Ranks:

The policy should include the authority's statutory requirement to provide a adequate number of taxi ranks or stands in each of the zones to accommodate licenced hackney vehicles.

18 Communication:

Greater communication between the authority and licenced drivers and stakeholders including a regular newsletter.

yours faithfully

From:
To: Taxis@shropshire.gov.uk
Subject: Hackney Carriage and Private Hire Policy Consultation
Date: Fri, 13 Jun 2014 15:59:15 +0000

Good Afternoon,

Please find attached information in regard to the Hackney Carriage and Private Hire Policy consultation.

Kind Regards

Shropshire Council Licensing Service

Tel: 0345 678 9026
Email: Taxis@shropshire.gov.uk

If you are not the intended recipient of this email please do not send it on
to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

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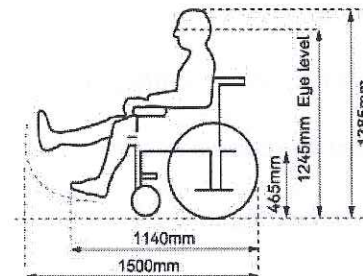
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WAV. (Wheel chair accessible vehicles) :

By adopting the 100% wheelchair accessible taxi policy, you will be discrimination against the very people that the Disability Discrimination Act was supposed to help. Most wheelchair users can transfer from wheelchair to saloon car but have great difficulty with WAV because the seats are at a greater height than the wheelchair (wheelchair height 465mm wav seat height 750 mm + _

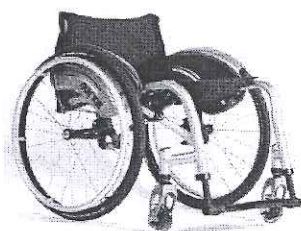


ZONE 4 TYPE HIGH SEATING POSITION



: SEAT HIGHT 465 MM

Many modern wheel chairs are of a carbon fibre composite, (quickie types) and cannot be strapped down into a wav due to the design and these passengers mostly prefer to transfer to a salon car.



CARBON FIBRE
quickie type



: saloon taxis type Shropshire zone 1,2,3,5

Not all disabled people are in wheelchairs. More than 20 million people in this country, including many whom are young and look very fit, have arthritis. Many of these would find it difficult to get into a Shrewsbury and Atcham ZONE 4 Type WAV.

Why make life harder for people who already live in pain?

Taxi drivers play a major part in transporting disabled persons and we would like to carry on doing so, but many of us may be prevented from this rewarding aspect of our business by this unnecessary legislation.

We have been transporting the disabled for many years, with Oswestry having one of the largest disabled collages in the country The Derwen Collage Gobowen and The Robert Jones and Agnes Hunt hospital. Many private hire licensed organisations specialize with wheelchair transportation including. Dial a ride, patient first, NSL.along with many independent private hire operators and have no unmet demand for services.

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