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With reference to your draft document Rules regulations and procedures for Hackney carriages and private hire licensing please could clarified several points and consider some of my suggestions.

#### **Section on driver's licences**

Will the requirement to complete a BTEC course in transporting passengers by hackney carriage and private hire become compulsory to existing drivers or will they be exempt through their past experience?

The driving of a licensed Hackney carriage/private hire vehicle can these be driven on a road test by motor mechanic's for fault diagnoses and or to confirm repairs have been carried out satisfactory.

#### **Section 7**

Will the council allocate more rank space to working ranks ie Morecambe Arndale during day shifts this is the only operating rank within Morecambe and also in Lancaster since the railway station rank was allowed to be moved its own width to put it onto railway property making this a pay to use rank again taking working rank space of the trade this then leaves only Lancaster bus station as a working day time rank again with only limited spaces available so most Morecambe based Hackney carriages instead of being able to ply for trade in Lancaster find themselves coming back to Morecambe to look for a rank space and work

#### **Section 12**

Would it not be better for all drivers? Hackney and private hire to display their badges facing the passenger on the dashboard instead of the wind screen but when worn on their chest 90% of passengers never see the driver's front and only ever see their back and possible their side.

## **Section 18**

### **part A left articles in vehicles**

This can't be complied with due to council office opening times as at some Christmas periods and Easter the office is shut for 96 hours and every bank holiday is shut for 72 hours.

### **Part B**

In realistic terms £5.00 will not get much further than Lancaster city centre and any item which requires delivering further than this will encounter financial penalty's to the driver/owner due to the distance required to travel to Lancaster town hall and back in some cases the item could cost the driver/owner £20.00 within the district not to mention outside the district.

Code of conduct for guidance of licensed hackney drivers

## **Section 1**

### **part B**

Some drivers who have medical conditions may at times need to drink or eat as per their condition disability could not this be seen to discriminate against them.

Supply of byelaws and code of conduct

## **Section 7**

In 20 years of driving both private hire and hackney vehicles as both a driver and proprietor I have never even when asked been supplied with a copy from the licensing department

Production of driving licence

## **Section 14**

Again this can't be complied with due to council office opening times Christmas, Easter and bank holidays also why is there a difference between a private hire driver and a hackney driver when a hackney driver has only 48 hours to produce his DVLA licence against a private hire driver who has 7 days.

Guidance for private hire drivers

## **Section 7**

### **Deposit of licence**

Is this to mean their DVLA driving licence or council issued private hire licence? if it's the latter would this also be a good idea for hackney drivers to deposit theirs either a copy or original with their vehicle owner? Preferably a copy so in the owner absence the driver could produce his original for any authorised request to do so.

## **Vehicle testing**

Re the MOT required as well as a council inspection (engineers report or certificate of compliance) this would be a duplication of the MOT as these would be the same except for council required items fire extinguisher, door signage, fare charts, and first aid equipment could these not be carried out as one by the council vehicle maintenance unit (which at present is a MOT testing centre) this would ensure the standards required are met and maintained to the professional standards as now to have two examinations would also incur more expense and down time and loss of income to the operator/driver

To move the twice yearly inspections from vehicles over 2 years to 4 in my opinion is dangerous as some vehicles at this point could have cover for over 500000 miles and wear and tear over this period should be inspected more frequently not saying that they would have done but could have possible done so. Also to only issue a 6 month plate will incur more expense to the operator and more administration to the council in making and issuing them could not this be done with the vehicles inside badge which the could be posted out to the proprietor and not require to take the vehicle off the road whilst a new plate is assigned to the vehicle

## **Part A**

If a vehicle has just been purchased to be used as a Hackney/ private hire its not possible for up to a month and longer in some cases to produce a registration document in the owners name due to DVLA turn around times this would then mean owners either having to purchase a second car well before they need to ensure the registration document is in their name in some cases this is not possible as most cars are traded in for the deposit on newer cars or a uneconomical brake down/accident occurs this would then leave the owner and driver without any income until they can secure a registration document in their name.

## **Insurance cover**

Some major insurance company's who insure taxis only issue quarterly policy Westminster being one. Also when a vehicle is changed and a new certificate is issued like myself on our cars our policy anniversary is April so would this be acceptable also on renewals its not unusual to be issued with 30 day cover notes whilst awaiting new certificates to be issued.

## **Condition of license**

### **Section 1**

#### **Engine capacity shall not be less than 1600cc**

As most vehicle manufactures' are bring smaller cc engines to market but are more power full and economical E5 for latest European spec I believe a example of this is skoda/vw/audi group they are producing a 1596cc engine which produces 105 BHP and greatly reduced co2 emissions and around £35.00 a year road tax against their 1900cc engine which again produced 105BHP but with more co2 emissions making it dearer to tax £110 per year in the past the skoda/vw/audi group fitted 1900cc engine which only produced 68BHP skoda Octavia classic which was used in Lancaster would it be better to ensure each vehicle had a minimum BHP instead of cubic capacity as more manufactures are following this example so this new policy would not let the trade use the most efficient engines available and in so keeping co2 emissions down and economy up. If this policy is adopted the trade would not be able to use offerings from ford, vw/audi group, skoda Peugeot/citroen, Flat, and Kia so as making them keep with the older more polluting engines.

The minimum door to door measurement would leave the trade unable to use some of the more economical vehicles which are already in use in the district skoda roomster and ford focus to name a few. I believe this to be a increase on the old minimum width from approx 48 inches.

#### **Glass areas**

To comply with this requirement where would the vehicles tax, permits, no smoking signs and vehicles inside licence card, as most driver use sat navs which require to be placed on the windscreen to operate, to not be able to use these would hinder the drivers as to know every street and major place in the district would be impossible and also when a vehicle leaves the district to take or pick up a fare these devises are a great help in reducing journey times and costs also in a later policy recruitment of drivers its says owners can advertise for drivers in the rear side windows

### **Section 11**

#### **Reporting accidents**

Again due to council opening hours the reporting and filling in the accident form can't be met for 72 hours also for accidents can the excising policy of having the vehicle inspected by the council before or to carry on using until a repair can be obtained be kept again this will maintain the standards required.

### **Section 13**

Some sat navs in cars are DVD based would these be exempt from this ruling?

#### **Private hire**

##### **Conditions of licence**

With the adopting new signage to private hire vehicles stating that the vehicle must be pre booked and that any journey taken without there being a booking before hand would render the insurance void and to be displayed in a conspicuous position. With front signage from the council and rear owners signage would this be better being on the council issued signage so guaranteeing signage and not over crowding the vehicle in signs also is the new signage required too wordy and will finish up still being ignored by the public when they require a cab.

##### **Conditions of licences**

With modern day equipment is computer records acceptable as due to the amount of bookings being handled.

#### **Part B**

To take a hirers address could leave any operator open to allegations of supplying information to criminals if any illegal activities take place at their property when its vacant. Also would this then be against the data protection act if when this information was stored on computer a enforcement officer required it?

The second part of your Proposal to have Hackneys all one colour and private hire another

This will mean owners are limited as to what type of vehicle they can run on replacement as to what is available in the chosen colour. Or go to more expenses and have it re sprayed as most manufactures colours differ in shade this would mean the ranks would be full of cars in different shades of the same colour also in some case the public when requiring a taxi would still try to flag a private hire down by the cars colour also irrespectively if it was a taxi or not.

Yours faithfully



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