

Further to our recent discussions regarding the consultations period for the above. I have discussed the conditions with Paul Spencer and we have the following comments:

Clause 3. The window signs, should they be in the rear windows only; the rear and passenger door window and in the case of 7 seaters in the rear 2 windows.

Clause 5. The roof signs "TAXI" it would appear that a majority of the roof signs only have TAXI on the front, as per the London taxis, on the rear they have the cab firm name or a telephone number. Is it fair to require the word "TAXI" on the rear as you would only flag a taxi from the front, also should there be a difference to the London taxis and others that are specifically built for taxis use i.e. Peugeot taxis.

Clause 7b. Centralised locking on most new cars and people carrier comes on automatically when the vehicle reaches a pre-set speed, which is usually between 5 - 20 MPH. This does not comply with this clause. If there is a requirement for centralised door locking not to be applied then the drivers will have to check whether the system can be isolated.

Clause 7f. The minimum headroom of 5 feet, this is the height from the floor of the car to the underside of the roof, this is to allow a wheel chair including its occupant to be wheel into the taxi. This is probably only possible in a London taxi or a purpose built or converted vehicle to facilitate a wheel chair plus occupant. It may be worth removing this clause.

Clause 7i. Concern has been raised regarding the use of run flat tyres, allowing the use of these tyres allows the driver to continue using the tyre for longer than specified by the manufacturer, even to the point of doing long journeys. I may be preferable to specify space saver tyres, which also require travelling at a slower speed, but are safer than a run flat which only designed to get the vehicle to the nearest garage.

Vehicle Inspections. It is suggested that when a vehicle is failed and then is returned for a retest the vehicle should only have travelled a minimal distance i.e. 100 miles, to and from a place of repair. There have been a number of vehicle returned for retest with up to 2000 miles. If the allowed distance is exceeded then a full retest is carried out with the appropriate fee.

It may be appropriate that the MOT certificate is valid for the period of the Hackney Carriage or Private Hire in trim inspection report.

Clause 15. The requirement for a fire extinguisher or first aid kit has been removed from the London taxi on the ground of health and safety. There is a greater danger if the wrong fire extinguisher is used than evacuating the vehicle and waiting for the fire service. First aid kit used by unqualified people can lead to litigation.

Other. Should a scale of tariffs be display and readable by passenger at all times.

Should you wish to discuss any of the above please do not hesitate to contact me.

Mike Hobbs
Facilities Manager