

Appendix A

Summary of consultation responses.

Name	Section Number	Comment	Officer notes
Matthew Kiely, TC Transport	All	Nothing to add. I am pleased to see the inclusion of wheelchair accessible taxis.	Supports proposal
Thurrock Diversity Network Limited, Ian Evans.	HCV Pre-licensing Standards 1.1	This is a welcome change to the Licensing conditions that will lead to a greater number of accessible vehicles throughout the borough and in turn increase the choice, control, independence and levels of social inclusion of disabled people in Thurrock.	Supports proposal
	1.3	In principle there is no issue with the age extension for wheelchair accessible vehicles, however, we suggest that all such vehicles should have “integral ramps” as standard on new models (1997 onwards – see, for example the LTI TX1 model onwards as opposed to the older model “Fairway” models that have separate “telescopic” ramps that take longer to prepare, make safe and use for both the driver and wheelchair user).	If telescopic ramps are used and fitted correctly they are just as effective and secure as integrated ramps. It will be too restrictive to only use vehicles with integrated ramps.
	7.2	The increased frequency of vehicle inspections is welcome to ensure that vehicles continue to be safe and in good working order.	Supports proposal
	1.6.3	The new minimum space for leg room is also a welcome change, particularly for people with limited / restricted mobility who may also have an aid or appliance (e.g. walking stick) to assist them	Supports proposal
	1.8	The requirement for only manufacturer’s recommended tyres to be fitted to vehicles is a positive step given safety	Supports proposal

		issues around the use of remoulds.	
	2.2	Whilst we recognise that Proprietors are likely to favour rear loading vehicles as the lower-cost option, the phasing out of all rear loading Hackney Carriage Vehicles is a positive development: Rear loading vehicles require 3 metres loading/unloading space at the back of the vehicle, which can cause safety concerns for the members of the public as well as other vehicles and road users. Furthermore, side loading vehicles offer greater safety as they allow more than one method of exiting the vehicle in the event of an accident.	Supports existing policy
	HCV Conditions 11.0	Ensuring that drivers comply with the requirement to carry Guide Dogs, Hearing Dogs, Dogs for the Disabled and Support Dogs is welcome and indeed in line with the current legislation under Part 12 (Section 168) of the Equality Act 2010.	Supports proposal
	6.0 (and CCTV appendix)	The inclusion of enhanced CCTV guidance will support the aim of detecting and reducing crime, reducing the fear of crime and increasing safety for passengers – particularly more vulnerable members of society.	Supports proposal
Richard Robinson Taxi Training & Technology	HCV Pre-licensing Standards 1.6.2	MPV vehicles fitted with M2 seats will only measure 16 inches across the width of the seat.	Conditions amended to allow an exemption for these vehicles at officer discretion.

	1.8	All new tyres from April this year will be colour coded for speed ratings.	For information
	2.3	As from 2011 all electric wheelchairs must be fitted with 4 point webbing restraints where fitted with in new vehicles Older vehicles the operator should make reasonable adjustments to accommodate the wheelchair and user.	This is for information only.
	7.2	7.2.2. would be advisable for 2 MOTS and 1 internal inspection 7.2.4. would be advisable for 3 MOTS and 2 internal inspections	This is an enhancement from what is proposed but is greater than the national standard.
	HCV Conditions 2.1 PHV Conditions 18.1	If you licence minibuses for contract work that are rear loading with a passenger lift fitted to meet construction and use regulations schedule 6 & 7 a second fire extinguisher to be fitted near the back doors and should be a 2litre AFFF with a minimum rating of 8A to 21.	Condition amended
	HC 11.0 PH 27	11.4.1 to .4. All assistance dog should travel at their owners feet in the front of the vehicle, but if a driver phobia or it is against the religious believes the driver may request the dog travels in the rear of the vehicle with the passenger, but only if the owner of the assist dog agrees.	Condition amended.
Jason Butcher Private Hire Vehicle Proprietor	PH 8.7.3	Minimum space for rear leg room. Could you confirm what you are proposing here and how will this affect myself where I have two rows of seating facing each other?	Condition updated to allow speciality vehicles to be exempt by agreement of the Licensing Department.
	13.2	Regarding the increased frequency of vehicle inspections to 4 monthly. This will lead to a higher cost being imparted to operators of these types of vehicle, especially	It is essential that the vehicles are tested regularly to ensure public safety, speciality

		myself where I have no option of purchasing a newer vehicle. Could I suggest that the extra cost incurred from the further 2 MOT's be subtracted from the licensing cost.	vehicles should be subject to the same tests as other vehicles. The current fee would not allow this to be deducted.
	13.2	It may also be an idea to offer this option to all operators as more frequent inspections will ensure a better standard is maintained. I feel that it is unfair that my yearly costs are going to raise by more than £100 compared to other operators just because of the vehicle I operate.	As Above.
Don Allison Fleet Management, contributor to the Hackney Carriage and Private Hire Vehicle National Inspection Standards	HCV Pre-licensing Standards 1.3	Why have an age limit and differentiate between saloon and wheelchair accessible vehicles? See paragraph 8.3 under private hire (PH) section.	Generally the wheelchair vehicles are purpose built or converted from commercial vehicles so are longer lasting. This also reflects the extra cost that is incurred when purchasing such a vehicle.
	1.8	Would you accept re-grooved tyres? See paragraph 8.9 under PH section.	Re grooved tyres are illegal for car, 4x4's or (LCV) Light Commercial Vehicles, we would allow them for commercial vehicles if licensed.
	1.13.1	May be better to state "no provision for seating shall be permitted there".	Condition amended
	2.2	What are your views on loading a disabled wheelchair, on a ramp, from the off-side?	Only nearside loading is permitted.

	HC 2.3 PH 9.1	I would suggest you add "in accordance with European Directive 76/115 EEC (as amended). See paragraph 9.1 under PH section.	Condition amended.
	6.1.1	That the proprietor produces a certificate of compliance to state that the LPG installation was undertaken by a Liquid Petroleum Gas Association (LPGA) approved installer	Condition amended.
	6.1.2	Recommend that you delete the existing paragraphs 6.1.1. and 6.1.2 and insert the new paragraph above.	Condition amended.
	6.1.3	From an inspection point of view no sure what you are trying to achieve here as many inspectors may not be familiar with LPG installations and therefore not able to confirm compliance. I would have thought that an LPG approved installation would cover this technical requirement.	Condition removed.
	6.1.5	Why insist on having space for a spare wheel?	The conditions do not require this.
	8.1.2	For completeness; only the Council has the delegated powers from Secretary of State to issue a Certificate of Compliance. The approved testing garage should complete a pro-forma appropriate to the test for the Council to issue a CofC. See also paragraph 14.1.2 under PH section.	Condition amended.
	HCV Conditions 8.2 & 8.3	May be easier to read if you changed the order of paragraph 8.2 and 8.3.	Condition amended.
	8.4	Replace "few" with "fee"	Condition amended.

	10.5	Replace “changed” with “changes”	Condition amended.
	PHV Pre-licensing Standards All	No reference to LPG in PH section	Condition amended.
	PHV Conditions 26.1.4	Should there be reference to calibration, maintenance etc.	This is incorporated in another condition
	All	I would recommend a paragraph on the carriage of passengers under 16 years not to be carried in a vehicle with side facing seats. See page 19, section 12.3 of the National Inspection Standards.	Condition amended.
	Appendix B – Trailers 8a	What would you consider a recognised manufacturer and would this sub-paragraph form part of the test?	Recognised manufacturer would be someone producing them as a business from a business premises, not home made or from a hobbyist.
ABC Taxis (UK) ltd	HC Pre-licensing Standards	I do not see it as being very practical if every Hackney Carriage vehicle were to be wheelchair accessible. These vehicles would then not be so easily accessible for our more elderly or for example pregnant customers to get in and out of due to the fact that wheelchair vehicles are a lot higher off the ground than saloon vehicles. It would also implicate a huge cost to my company to replace our current Hackney Carriage vehicles with wheelchair accessible vehicles. I understand that we need to make sure we are offering wheelchair accessible vehicles for	There is no added requirement for an existing licence holder to replace a saloon vehicle with a wheelchair accessible vehicle so this will not cause and additional cost to the business. The requirement to replace the vehicle only comes into effect when the owner transfers the licence to another person.

		<p>those with disabilities and who are permanently in wheelchairs but I do not see that there is a good enough reason for all of our vehicles to be like this.</p>	<p>All wheelchair accessible vehicles where there is a step in excess of 9” should be fitted with a second step no greater than 6” high. The normal height of a wheelchair accessible vehicle is 11”. The provision of a second step either manually operated or electronically operated would resolve this issue.</p>
	<p>HC Pre-licensing Standards 4.1</p> <p>PH Pre-licensing Standards 11.1</p>	<p>Tinted windows are standard on the majority of the vehicles that we buy and the law requires that there is at least 75 per cent of light through the front windscreen and 70 per cent of light through the front side windows, our vehicles meet these requirements and the standard factory made tints on our vehicles allow us to have full view of the road and other road users such as pedestrians and cyclists, especially in low light conditions. I don't see why Thurrock Council should change their licensing rules in relation to this. I could understand if windows were completely tinted out to the point where you couldn't see into the vehicles but none of our vehicles are like this.</p> <p>As a large amount of our work is in London or around the M25 where you can sometimes be stuck in traffic for hours, it makes the passenger's journey a little more comfortable with the sun not glaring at them through the back windows. Also in our trade the look of the cars counts for a lot and when the car has tints it looks more executive.</p>	<p>Condition amended.</p>

		I would understand if Hackney Carriages were made to have clear glass or only 25 per cent tints but to make Private Hire Vehicles also have clear glass would impact on our business.	
Thurrock Licensed Drivers Association	HC Pre-licensing Standards 1.2 & 1.3 PH Pre-licensing Standards 8.3	Firstly, as an association, we would like to applaud the department for giving us our requested vehicle age increase. This has shown that we are listened to and our requests etc are considered. This has most certainly restored a little faith back into our Licensing Department. Thank You.	Supports proposal
	HC Conditions 8 PH Conditions 24	<u>Testing regime</u> After considering the D.O.T best practice guide, which suggests that vehicles have <u>no more than 3 examinations per year</u> , we feel that the proposed changes to the testing regime are rather unfair especially in this time of economic downturn. In addition to this, MOT stations would simply not be able to cope with the additional strain of going from <u>400 to 1200 tests per year</u> and we are very concerned that this would have a knock on effect causing a backlog of vehicles waiting to be tested. We the trade feel that a good compromise would be for saloon type vehicles to have an annual M.O.T up to 7 years of age and subsequent M.O.T's would be 6	The National guidance on minimum standards recommends as a minimum "Frequency of testing 2 times per year. 3 times per year after vehicles are 8 years or over as vehicles are more likely to encounter mechanical problems which may affect passenger safety." The capacity of the testing stations should not be an issue, however the Licensing

		<p>monthly and W.A.V's would have an annual M.O.T up to ten years of age and subsequent M.O.T's would be 6 monthly. With the ad-hoc inspections we are also subjected to, we as an association agree that public safety would not be compromised with our proposal.</p>	<p>Team will monitor the situation and can increase the capacity if required.</p> <p>Road side checks are not a full inspection of the vehicle and should not be included as part of their yearly tests.</p>
<p>HC Conditions 2.3</p> <p>PH Conditions 18.3</p>	<p><u>High Viz Vests and Triangles</u></p> <p>We feel that the section calling for hi viz vests and warning triangles is quite frankly ridiculous. Do buses, coaches and indeed trains carry 60+ hi viz vests and triangles? We as taxis have limited space as it is, yet you are proposing that we are to fill our luggage space with something that will surely never be used! These items will simply just get in the way or be stolen by passengers "wanting a trophy" if given half the chance, with us having to replace them time and time again. This is yet just another financial burden being pushed upon us for no reason other than "P.C foolishness."</p>	<p>The provision of high visibility vests will add to passenger safety in the event of vehicle breakdown or an accident. The vests can be stored in the boot of the vehicle away from access by passengers until they are required to be used.</p>	
<p>HC Conditions 7</p> <p>PH Conditions 23</p>	<p><u>Advertising on vehicles</u></p> <p>We as an association do not want to see any third party advertising on cabs in the borough. We would like to see livery only. This is because we don't want to see one of the large private hire companies getting their vehicles wrapped and the knock on effect of people assuming that they are the only "proper taxis".</p>	<p>Third party advertising would allow for vehicle owners to generate an additional income from their vehicles.</p>	

	HC Pre-licensing Standards 1.1	<p><u>Plate Transfers</u></p> <p>We as an association applaud the removal of the right to transfer plates for a “price”. It is our view that no one should “own” the plate on the vehicle and earn a premium because of this.</p>	Supports proposal
	HC Pre-licensing Standards 1.1 & 1.2 PH Pre-licensing Standards 8.3 & 8.4	<p><u>Six Seaters Luggage Space</u></p> <p>We have been discussing whether Six Seaters should be excluded from the age increase, ie cars with no luggage space with all six seats deployed. We strongly believe that they should either be retired at 7 years or downsized to 4 seats for the remaining license period. I have checked some vehicles and found that the Ford Galaxy Vehicles can hold six suitcases with all seats deployed yet others such as the VW Tauran et al can not.</p>	This is a suggestion to allow existing vehicles that do not comply with these new standards to be kept until they are 7 years of age rather than the 10 year proposed in the conditions.
	Not related to this document	<p><u>Reduce our fees accordingly</u></p> <p>As we have been told that the new style plates we are now receiving are in fact ‘cheaper,’ we feel that the council should pass on their saving and reduce our fees accordingly. We think this is only fair as the council are fully aware that you must not receive any profits from making/issuing badges/plates and therefore I repeat that</p>	<p>This point does not directly relate to the Pre-licensing Standards or conditions.</p> <p>Fees are subject to review and increase in costs or savings will be reflected in future fee reviews as appropriate.</p>

		we feel the council should pass on their saving and reduce our fees accordingly.	
Ian Williamson HC Driver	HC Pre-licensing Standards 1.2 & 1.3 PH Pre-licensing Standards 8.3	You are proposing to extend the age limit of vehicles which I agree would be a good idea,	Supports proposal
	HC Pre-licensing Standards 1.2 & 1.3	<p>However on extending both saloon vehicles and wheelchair accessible vehicle age, you are still proposing that a new vehicle to be licensed will remain as minimum 4 years old.</p> <p>A new vehicle purchased whether 4, 5, 6 or even 7 years old as was previously the case, can be bought in very good condition from a previous good owner with low mileage, full service history and obviously can be checked out by the AA, RAC or a reputable garage. By limiting a vehicle at first point of licensing to 4 years, a car of this age is becoming increasingly expensive to purchase, often has to be bought from a dealer with finance and is not necessarily as it looks or in as good condition as a slightly older vehicle could be.</p> <p>I feel that by extending the maximum age of vehicles, the new vehicles at first point of licensing should also be extended from 4 years to either 5, 6 or even 7 years.</p>	By setting a maximum age at the 1 st time of licensing ensures the quality of the fleet. This also ensures that developments in safety technology incorporated in newer cars enters the fleet at an earlier point.

	HC Pre-licensing Standards 1.1	<p>Secondly, you are proposing that when a license is transferred to a new license holder, when the vehicle is replaced it must be with a wheelchair accessible vehicle. If you go ahead with this proposal you will eventually end up with every vehicle being wheelchair accessible. Surely this cannot be in any way good for the Hackney Carriage taxi, which is already experiencing difficult times. Many people that use taxi's, prefer to use the saloon type cars and in certain circumstances will avoid getting into a wheelchair accessible vehicle in favour of a normal saloon.</p> <p>Any vehicle presented for a new hackney carriage license must be wheelchair accessible, therefore I cannot see any benefit from replacing the existing saloon cars. This can only have a negative effect on the trade.</p>	<p>By allowing existing licence holders to keep saloon cars will maintain a selection of vehicles.</p> <p>Private Hire vehicles can be a saloon vehicle which allows an alternative if a customer does not wish to use a wheelchair accessible vehicle.</p>
42 Driver letters (The same letter has been received individually from 42 drivers)	HC Pre-licensing Standards 1.1	<p>Thurrock Council licensing department have proposed a policy for pre-licensing requirements s hackney carriage and private hire vehicles. The process will bring many changes. Below is a summary of the effect of these new changes on us i.e. hackney carriage and private hire vehicles.</p> <p>As mentioned in the new policy that if (hackney Carriage) proprietors transfer its license to new license holder and when the new licence holder replaces the vehicle it must be wheelchair accessible vehicle.</p> <ol style="list-style-type: none"> 1. The licensing department is aware of this fact that we have paid a huge sum of amount to purchase a hackney carriage vehicle with plate mostly loaned 	<p>The Thurrock Licensed Drivers Association supports the change proposed opposed to the view of these drivers.</p> <p>This condition will provide a greater number of wheelchair accessible vehicles as Hackney Carriages over the years.</p> <p>Vehicles can still be sold as a licensed saloon and that vehicle could be used for up to</p>

		<p>from bank or financed. So, when this hackney carriage plate is transferred to disabled our money paid becomes is forever lost to us. Which is catastrophic for us because we not only make our living from this trade but invest in it for future capital value.</p> <p>The proposal to change normal saloon vehicles (MPVS) to wheelchair accessible affect us as wheelchair accessible vehicles are:</p> <ul style="list-style-type: none"> • Expensive • Insurance too high • Some customers who are disabled or old age find wheelchair accessible vehicle hard to get on board and they are not comfortable for them. • Because most wheelchair accessible vehicles are 7 and 8 seater so they are not cheap to do local and long runs because of their fuel consumptions are too high. 	its 10 year life unless the new owner changes the vehicle.
	<p>HC Pre-licensing Standards 4.1.</p> <p>PH Pre-licensing Standards 11.1</p>	<p>As for the tinted windows those vehicle with company fitted tint windows should be allowed for hackney carriage or private hire vehicles.</p> <p>In the current mano economic situation where business is going down day by day.The Thurrock council licensing department should adopt and bring upon changes which are positive both in present day and future.</p>	Condition amended
Anonymous through Thurrock Councils Website consultation.	PH Pre-licensing Standards 11.1	Section 11. Tinted windows. Would this not make it very difficult when purchasing a new vehicle as most new cars these days have at least some tint to the glass. Would it be better just to ban privacy glass.	Condition amended

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