

Telford Hackney Carriage Association

Honorary Life President. Mr E.B.Jones.

Chairman. Brian Smith. Vice Chairman. Secretary. A. Tawasin.

14/8/2012

Tele: 07971400069.

Dear Committee Members.

Regarding condition 2.2 on enclosed condition Type of Vehicle.

This is a continuation to the previous letter (**below**) we sent to you Objecting to changes to Condition 2.2 (type of vehicle) at the last meeting we were supported by the London Taxi Cab Company previously LTI who also petitioned against any changes of Policy and are as far as I know still hold the same position on the changes. It was stated that the council had not made provision with the Trade about any changes (and is still the same) that would need to be made regarding plans to be set up for what types of vehicles would meet the needs in Telford, in the Change of Conditions it states that Hackney Carriages should take a minimum of one wheelchair user which we are, as 100% Purpose Built taxis, as the Hackney Carriages TX TAXIS have to be, to be compliant with, this as it is part of the London PCO conditions and this also applies to the Mercedes Taxi (Vito) and the new Nissan Taxi.

There are no set up Conditions as stated, as to what other vehicles are proposed to be used and what conditions should be put in practice as to the age limits on the other vehicles that the Council? want to use, the whole spectrum of conditions need amending for these proposals, we propose if these changes are forced in **against our will**, then the following, should be taken into account and considered on our behalf with consultation with the trade.

- (1) Hackney Carriage are part of the Telford Transport Plan and should be treated as such, any potential Customers that require Specialist/Ambulant type vehicles are not the expected type of Customers to be using Taxi Ranks, and as such it cannot be reasonable for Hackney Carriages Owners to buy these type of vehicles that will never probably used, any such type vehicles can be obtained by pre-booking with Telford & Wrekin Councils Red Bus scheme or from Voluntary Organisations at reasonable rates set by them, making the need for these vehicles not necessary on Taxi Ranks because logic dictates that people with special needs are aware that they need forward planning on their Transport needs.
- (2) The minimum age that a vehicle can be licensed in Telford,
- (3) Regarding this the Trade who have abided by a 10 year age limit for 20 years, we propose you increase this to 12 years, for PCO Type Taxis.
- (4) And you bring in a policy that all new licences issued should only go to vehicles that are brand new on their inception including PCO Allowed Taxis and stays with the same vehicle through its entire life as a Taxi in Telford, which in itself would improve the vehicles used on a daily basis and insure that people who come into the trade are **making a proper commitment** as to their intentions and not to allow older types of vehicles to be used as a stop gap to enter the trade in

these days of hardship, as a way of being self employed until something better comes along, this may sound harsh but the **Owners in the trade have already proved they are in it for the long stay** and do not want to lose their livelihoods, because people use older vehicles as a stop gap in their employment status, **more taxis do not mean more work**, and could be influential in trade members being lost through having to many **taxis and not enough work and nowhere to park** as is the case in Wolverhampton/Shrewsbury and other areas who have lost regulation of taxis numbers, which **we have not had for years**.

- (5) What age limit do you propose on any new type of vehicle that is not PCO approved, the Private Hire E7 equivalent has a 7 year age limit, logic says the Hackney Carriage Version age limit should be the same 7 years, or are you going to change the Age Limit structure for all vehicles, I think not?.
- (6) All existing licences on Taxi Cabs in Telford retain the Conditions that they now have as is their Grandfathers rights which we was agreed at earlier meetings with I believe Mr Gary Emerson.
- (7) Taxis issued new licences can of course be transferred to a vehicle of the same make year etc, in the case of total right offs (Insurance Claims) caused by accidents, but for no other reason, unless agreed by the Trade and the Council, as we are fighting for the survival of our **livelihoods as Hackney Carriage Owners and drivers**.
- (8) As a last statement can I please add that the Law Commission are at the moment in Consultation about the whole Taxi Trade and we do not even know that there will be a two-tier Taxi system in the near future which could deem this whole process pointless, if the power over Taxis is taken out of the hands of Local Councils (which is also one of the points they are Consulting about), and done under one complete new set of rules set by them, surly it would be better to wait for the results from the Law Commission.

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From April 2010 Objections which were agreed by the Council Committee Members
With reference to the proposed change of vehicle type to be put before the Licensing
Committee on the 29th March 2010.

This application was not applied for by the Hackney Carriage Trade of Telford but by an outside party the effects on whom could be devastating. The trade is currently so sparse that hackney drivers are struggling to make a living. For this reason alone, it is our opinion that the issuing of hackney plates should be restricted for a minimum of two years when by which time an upturn in the economy would afford better trade.

Regarding the type of vehicle used for hackney carriages in Telford, for at least the last twenty-five years, Telford & Wrekin Council has been moderated by the PCO in London, which has been an excellent partnership for the Council and has worked perfectly as detailed in Licence proposal (3.Summary 3.1). This also highlights that **the PCO are reviewing their conditions** regarding the type of vehicle in 2012. It would be appropriate to wait for this review to determine the type of vehicles which would save this Council from having to do their own review and be kept in context of the PCO who are more experienced and knowledgeable of any change in vehicle type, which has been proven for over twenty-five years, so why not now?

The Liverpool case of course also has an impact of impending changes in vehicle type but this should not have any effect on Wrekin Council as in retrospect will not be stopping different types of vehicle being used, but waiting for a decision from the PCO who are an authority in this area. We feel that Telford & Wrekin Council would not be open to legal action as they would be waiting for a decision from the PCO of whom the Hackney Trade trust and support implicitly. Why fix something if it isn't already broken?

We are interested in fair trade and keeping ourselves in gainful employment and wish to avoid becoming unemployed or at worse bankrupt. As Telford grows in the future, we will indeed need more hackney carriages but at this moment in time the current economic state does not support the need.

As the Council rightly point out there are supposed to be 2000 different types of wheelchairs, most of which require what we call "Ambulant type" vehicles (referring to Hackney Carriages), which are specialist and not the type you would expect to find waiting at a Taxi Rank which seems to us an unreachable target to cover. The Council also point out The Mercedes Vito, which is a Licensed Vehicle in Telford, is perfectly capable of doing anything the proposed types of vehicle can do, if not more. This however, is erroneous, as the Mercedes Vito *cannot* carry forward facing wheelchairs. However, the orientation of the wheelchair forward facing or not, in situations such as accidents really is irrelevant and totally pointless, impact comes from many directions. **The Hackney Carriage Drivers in Telford** have taken and are taking NVQ equivalent type tests that state wheelchairs must be rear facings which is a mandatory requirement

when tendering for Council Contracts and also a part of the DSA Taxi test. We would also add that vehicles housing forward facing wheelchairs are also known as *specialist* vehicles, to abide by the Disability Discrimination act all these types of vehicle would be beyond the resources of the average Taxi Owner/Driver because as you are aware all Hackney Carriages Owners/Drivers are self employed, and as previously mentioned we are currently having a very hard time making a living in this current climate and to be put in a position by these proposals of being made unemployed is quite frankly ill conceived and completely unacceptable. I don't believe for one moment that this is the council's position, but is being ruled by an outside force, not of the Hackney Trade in Telford, that is only motivated by their financial gain.

Signed B.Smith/Chairman