

Appendix A

Representation to Council consultation on Operator Conditions

Please consider the following for consultation.

5 - CCTV - This should not be an operator condition but a vehicle licensing condition. Enforcement of vehicles is not in the remit of operators and to include this in these conditions is simply a lazy way for licensing to pass enforcement onto operators. This is quite simply introducing new vehicle conditions by the back door. The high cost of CCTV that stores data remotely needs properly investigating and I suggest the council consults further on this with Mr Andy Ashton as he installs equipment such as this and knows of the pros and cons to avoid adding an extra financial burden on PH drivers.

6 - Facilities for Electronic Payment of Fares - Again this is another attempt to introduce a new condition onto operators which should be attached to either vehicle compliance of driver licensing after proper investigation regarding the cost..

17 - Assistance Dogs - This paragraph fails to mention the possibility of a driver having a Notice of Exemption under the Disability Discrimination Act

18 - Adapted Vehicles - 100% of the towns Hackney Carriage fleet are capable of carrying a standard size wheelchair while the wheelchair user remains seated. Due to the high cost of adapted vehicles this condition needs full and proper research. Is there an unmet demand for vehicles to provide transport for larger wheel chairs and if so then how many complaints or enquiries have the council received about this issue?

Also where has the figure 1 in 20 of the fleet come from? Both ABC and Metro have around 100 PH vehicles meaning that they would have to purchase 5 adapted vehicles each at considerable cost. Is it really feasible in a town with our population that 10 passengers with oversize wheelchairs would want a private hire vehicle at the same time? I would like to see the results of any study proving this to be the case.

Many of the wheelchair adapted vehicles that I have looked at online have smaller replacement rear seats. This would render them unusable for normal private hire work as the rear seats do not meet the minimum width requirements for licensing (See attached photos). This could mean that these vehicles sit idle until they are requested. This raises issues of cost effectiveness and vehicle storage.

Thank you for taking the time to read my comments.