

Michael Cook

From: Michael Mead <info@manningtreetaxis.co.uk>
Sent: 25 February 2016 00:03
To: Licensing Section
Subject: Comment regarding Tendring District Council's current seating capacity policy

Name: Michael Mead
Badge No. [REDACTED]

Dear Sir / Madam

I write with reference to the letter dated 5th February 2016, which relates to the review of the current seating policy for Multi-purpose vehicles carrying up to 8 passengers.

As a proprietor and driver of a 4 seater car and a 8 seater minibus, both licensed as Hackney Carriage vehicles by Tendring District Council I would like to add my view to the consultation currently being undertaken by the Licensing and Registration Committee.

Firstly, may I thank you for giving me the opportunity to provide my opinion with regard to Tendring District Councils policy on the licensing of multi-purpose vehicle as Hackney Carriage and Private Hire Vehicles. On reviewing the councils current seating capacity policy I would like to make the following three points:

(1) I note from your letter of 5th February 2016 that it mentions the seating policy as introduced by Basildon Council.

If vehicles licensed under Tendring District Council are unable to provide the necessary seating capacity and transportation that the residents of Tendring require, due to restrictive regulation it is not the Basildon area where they will seek an alternative, it will be the transport providers in the areas of Colchester and Ipswich that they will contact, thus it could be said that these are the providers that we as transport suppliers based in Tendring must compete with in order to survive.

Therefore with this in mind, to provide Tendring transport providers with 'a fair playing field' it would be the policies as set down by Colchester and Ipswich councils where I would look to form some kind of comparison / guidance.

(2) I note that condition (e) states that "nor should it be necessary to climb over any person being carried in the vehicle or require any person to leave their seat to allow anyone to enter or leave the vehicle".

If this policy was introduced for the safety of all passengers then this policy would also need to be applied to the middle seat in the rear of every car. A passenger sitting in the middle rear seat of every car licensed by Tendring District Council currently has to climb over any person or require at least one person to leave the car for the middle passenger to leave said vehicle.

This policy is not required for cars which carry four passengers and therefore I do not see the need for it to apply to vehicles that carry more than four passengers.

(3) I note that condition (f) states that "in the interests of public safety and comfort, the council will require as many seats as may be deemed necessary to be removed".

Firstly, all multi-purpose vehicles that drive on British roads have been tested by the Department of Transport to ensure that the occupants are conveyed in both comfort and safety. If this was not the case, the vehicle would not allowed to be registered to travel on the public roads of the United Kingdom. Secondly has anyone thought of the possible instability / reduced structural integrity that the changing / removing of a seat could cause?

APPENDIX 4

By changing the layout of the seats or removing any seats alters the way a vehicle may react whilst being driven or in the event of it being involved in a collision. Such a request by Tendring District Council may actually increase the risk of injury to those being conveyed, leaving Tendring District Council open to possible litigation.

In conclusion, based on the points I have raised above my suggestion for the licensing of vehicles for Hackney Carriage or Private Hire, including the number of passengers that can be conveyed, would be as follows:

* If a vehicle has been tested by the Department of Transport and has been deemed to be safe, to transport a set number of passengers as registered with the DVLA on the public roads of the United Kingdom. Then said vehicle is deemed to be safe to be used as a Hackney Carriage / Private Hire vehicle for the transportation of said number of passengers on the public roads of the United Kingdom.

I look forward to hearing the outcome of your consultation exercise and I hope the points I have raised above will help in some way to form a new seating policy, for the licensing of Multi-Purpose Vehicles by Tendring District Council.

With kind regards,

Michael Mead

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LICENSING SECTION	
RECEIVED	25 FEB 2016
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