

Representation 1

From Drivers and Proprietors

4/12/14

We would like to make the following comments with regard to the proposed policy changes. With regard to the proposal that vehicles over 8 years old would need to be checked every 6 months. The Council can already call in a vehicle at any time for a spot check at no extra cost to the operator, but an inspection by your approved garage would obviously incur higher charges to the operator which we would consider discriminatory. We do have two taxis over 8 years old which have to be maintained to a high standard to meet the Certificate of Compliance conditions. Old parts are replaced with new, so the age of the vehicle is really irrelevant. If the chassis were rusty or dangerous, it would not pass the annual inspection, regardless of age.

Secondly, we would like the Council to consider the option of extending the life of the driver's licences to 5 years, and thereby enabling a reduction in the cost. We notice that even in London the licence is valid for 5 years and costs £50.00 i.e. £10.00 a year as opposed to the Isle of Wight Council's annual charge of £65.00.

<http://www.tfl.gov.uk/cdn/static/cms/documents/taxi-driver-application-pack.pdf>

We are both need to renew our PCV licenses annually, incurring only the cost of the annual medical. If the government can do that for bus/coach drivers why can taxi drivers not be treated the same way?

By extending the life of the licence you would be reducing the paperwork and workload of your staff, who would just need to ensure medicals and CRB checks are carried out at the appropriate intervals.

Also we understand that by law licence fees should only cover the cost of administering them, so a reduction in administration would inevitably reduce the cost of the licences themselves. This would make it lot easier to get interest from new people coming into the trade, many of whom are put off by the high cost at the moment.

5/12/14

Further to our email of yesterday, we have re-read the taxi driver pack for tfl and wish to amend our comments. We notice that in London there is an initial fee of £50.00 submitted with the application, then an additional fee of £199.00 on completion of the process - covering medical, CRB check, knowledge test and a driving test carried out by the DSA. This works out at £249.00 for the 5 year licence paid to tfl i.e. just under £50.00 a year as opposed to the Island's charge of £65.00 a year.

With regard to their vehicle specks in London, they insist on an MOT inspection every six months for all hackney carriages, not just vehicles over 8 years as proposed here on the Island. The mileage covered by London cabs would be much higher than on the Island and this ruling is more understandable in the circumstances. We still believe that any rule imposed here should apply to all, not be discriminatory against older vehicles. We have coaches over 30 years old and they are still only subjected to one MOT inspection a year. The only age limitation on London cabs is with regard to vehicles over 18 years with regard to emissions, which have not been adapted. They also have higher emissions specks for HGV and PSV in London, with the LEZ, which has not yet been adopted by the Island.

Representation 2

From a Driver and Proprietor

4/12/14

Having now received the draft copy of the proposed changes regarding HC/PH policy, I would like to express my personal views as requested by yourselves.

Firstly I would like to point out that you note the only major change is regarding the frequency of the compliance. Please could you therefore make it clearer to me the other proposed changes that you feel are not as important?

I would like to refer to the point that the licensing view is that there should be no cap on the amount of licenses issued. Personally I do not have a problem with the amount of licenses you issue, however there is only a limited amount of work available, the more plates that are issued the less work there is for every other driver. I know a viability report would be expensive to ensue. However you only need to look at the evermore growing lack of spaces on the ranks, this should perhaps give you a good idea of the overcrowding that is now happening. I accept that at certain times of the day, ranks may be less crowded due to contracts and school runs, as an independent driver I would like to assure you that at these peak times there are taxi's available, it is simply because people prefer to ring their regular companies and not use the ranks that some feel there is a lack of taxi's.

With regards to the frequency of compliance, I would first ask where your figures come from that assume a vehicle over eight years of age or that has over 150,000 miles on the clock is more likely to have the defects that are in connection with a compliance. Having studied all of the checks on the compliance form, I feel the majority relate to safety and the others the condition of the vehicle. For example: If a vehicle is only two years old does that assume the tyres are legal, as the brakes etc. Regarding the interior, you already do random checks to ensure the vehicle is satisfactory. I feel that the proposal to introduce this new regulation is not acting fairly on all vehicle owners. My vehicle is ten years old, however a driver with a newer vehicle may take less care than myself. Therefore I can only come to the conclusion that if you wish to introduce this policy, you should do it for all or none.

21/12/14

Further to my comments regarding the proposed changes, please could you also take another view of mine into consideration. If the compliance is to be twice a year (I suspect this will happen) then on the grounds of fairness and to stop any suggestion of foul play (such as back handers) would it not make sense to have two testing stations on the island. Let's face it, if we have two compliances Adams Morey will double their profit at our expense. If you have two testing stations it will give us a choice and thus remove the complacent monopoly that A.M has.

Representation 2

From a Driver and Proprietor

30/12/14

Having read the current proposals I think may be wiser to have a "one size fits all" policy in terms of a twice annual test after a period of 3 years. Furthermore if a twice annual test prevents the unwanted and unnecessary harassment from police and other agencies for those of us who do comply with the laws then I am all for it!!!

Representation 4

From a Driver and Proprietor

31/12/14

I would like to make the following comments about your draft policy. Obviously the main ones concern the compliance tests on vehicles over 8 years old and which have done over 150,000 miles. Though I can see where you are coming from I feel that firms such as myself which has a rigorous maintenance schedule in our own garage and operate a large number of vehicles in the above categories are being unfairly treated. You can check that our vehicles are of the highest standards when inspected on any occasion by whoever. The cost of extra compliances will eat into profits and thus restrict further investment in new vehicles which we have been able to do up to now. The other point that I would like to make is that out of the total hackney and private hire fleet on the Island a large proportion of which would fall in to the above categories. This would mean that with only one contracted garage that the IOW council uses they would not be able to cope with the extra demand as even now it is hard to get the appointment that you want at times. Surely if these proposals go through an alternative garage would be a good idea. Also how would the six monthly tests work in conjunction with the M.O.T test which is obligatory. I would be interested in your response.