

Comments regarding the
proposed changes to Wycombe
District Council Hackney
Carriage and Private Hire
Licensing Policy

Compiled By

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Hackney Carriage Trade Representative

Wycombe District Licensing Area

Wheelchair accessible vehicles

The general perception from some current wheelchair accessible drivers/ proprietors and Saloon car drivers/ Proprietors is that it should be stipulated in the taxi policy that wheelchair accessible hackney carriage should only be side loading as per the current policy.

It is proposed that the council should not accept rear-loading hackney carriage for the following reasons

- Within the Wycombe district area our ranks are designed for saloon and side loading vehicles, not rear loaders. A safe working space at the rear of the vehicle cannot be assured. To facilitate loading it is very likely and foreseeable that a vehicle would have to move off the rank and into the carriageway obstructing other road users and emergency vehicle with a risk of a collision.
- The limited space on the ranks (3.2 meters rear clearance required).
- The risk of bringing the wheelchair user into the road.
- There are bars between the rear seating and the designated wheelchair space in particularly in the Fiat Doblo so if there was an accident to the rear, there would be no way for the wheelchair user to exit.

Several authorities and National Organization's such as RADAR (Royal association for disability and rehabilitation), Scope, Disabled persons transport advisory committee and other bodies concerned with road safety have had policies advising against rear loading Wheelchair Vehicles being used as Taxis.

Their main concerns revolve around Wheelchair users being in the road when entering and exiting the vehicle and passengers being seated in the 'Crumple Zone' at the rear of the vehicle. They also highlight the scarce rank space and lack of alternative exits for wheelchair users in the event of an accident.

- Section 26 – 28 of the department of transports taxi and private hire vehicle best practice guidance relates to purpose built taxis this section includes the recommendations

The risk of rear loading taxis for disabled passengers.

- It is always safer to keep wheelchair users on the pavement then to put them in the road, particularly facing away from on coming traffic, which is necessary for rear loading vehicles.

- Taxi drivers may not be familiar with the lowering of wheelchair over a kerb and this can present dangers to passengers, passengers using a electric wheelchair may find it impossible to go down over a kerb at a rank but if access is from the pavement (Side Loading) none of these issues arise.
- The rear loading taxis leave the wheelchair passenger right at the back of the vehicle in the Rear Impact Zone.
- It is also important that wheelchair passengers have an alternative exit in the event of an accident. A side-loading vehicle will always offer the passenger the opportunity to exit from the other side in the event of an emergency. In the case of a rear-loading vehicle, where the rear doors or tailgate are damaged, this would be impossible.

To control the risks identified the simplest measure would be to license side loading vehicles.

Should the council decide to allow rear access as Hackney Carriage a formal risk assessment should be sought prior to decision being made in the interest of passenger / public safety.

Vehicle age limit

The general consensus amongst the trade is that existing wheelchair accessible vehicles should be licensed for the full 14 year term as when the drivers purchased the vehicles they invested their money taking into consideration that they will be allowed to run these vehicles for 14 years. The trade requests that new wheelchair accessible vehicles should be licensed for the term of 14 years if not at least run along side our neighbouring authority South Bucks that license wheelchair accessible vehicles up to 12 years.

Due to the increase of hackney carriage vehicles following de-regulation it is very difficult to gain the minimum wage. Which in turn shows that vehicles don't do excessive mileage therefore it would make sense to issue yearly licenses until the vehicle has reached 8 years of age.

Dacorm Borough Council whose drivers do similar annual mileage as WDC drivers get yearly licenses for up to 10 years.

Tinted windows

The members of the trade would like the council to relax the rule restricting the taxi drivers from having tinted windows we should be allowed to license vehicles, which have manufactures tints. On 22/10/2016 Slough Council implemented this policy. Following a survey conducted across 43 police forces that there is no identifiable information held by any police force in England and Wales to suggest that antiglare or tinted glass has ever contributed to the commission of any offence or alleged offence by anyone in a taxi.

Warnings

The trade as a whole is very aggrieved with an element of this policy. They state that once the warning time limit of three years has been reached it should be classed as spent, should a driver receive a warning within the three years it should be listed as a separate offence and not effect the time limit of the previous warning. Should a complaint not be substantiated then it is unfair to be kept on file and used against the driver in the future.

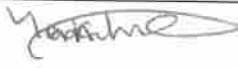








We confirm that we have made the comments in the attached report regarding the proposed changes to the taxi policy.

	Name	Badge Number/ Number plate	Signature & Date
①	WASID ALI ASGHAR	BADGE J362 HC 1030	Wasid A. Asghar 12/12/16
②	MUHS MUNSAF	J364 HC1010	12/12/16 M. MUNSAF
③	MUHAMMAD NAHEEM	J360 HC1019	M. Naheem 12/12/16
④	M. Z. BASHIR	J336 HC017	M. Z. Bashir 12.12.16
⑤	MAHMUD HUSSAIN	J083 HC065	M. Hussain 12.12.16
⑥	BARRY WILDMAN	H014 HC.P. 04	Barry Wildman 12/12/16
⑦	TARIQ HUSSAIN	J.017 HC 052	T. Hussain 12-12-16
⑧	M. MALIK	J309 HC013	M. Malik 12/12/16
⑨	A. ASGHAR	HC010 HC19	A. Asghar 12/12/16
⑩	M. WASEEM	HC1032 J191	M. Waseem 12/12/2016
⑪	I. SADDIQUE	HC036 J270	I. Saddique 12/12/2016
⑫	Raja Anjil	HC019 J078	Raja Anjil 12/12/16





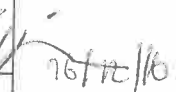




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	Name	Badge Number/ Number plate	Signature & Date
13	ANSAR MAHMOOD	J086 H/C 026	A. Mahmood 12/12/16
14	ALIANA DITTA	J269 H/C1015	A DITTA 12/12/16
15	AMJAD MAHMOOD	J155 Hc1017	Aajid 12/12/16
16	MOHAMMED IQBAL	J406 H058	Muhammad 12/12/16
17	MOHAMMED FIROZ	J096 Hc97	Muhammad 13/14/16
18	ASJAD ALI	J332 Hc61	Asjad 13/12/16
19	TARIQ MAHMOOD	J468 H.c.1019	Tariq 13/12/16
20	QASIM IQBAL	J502 H015	Qasim 13/12/16
21	ASIM KHAN	J417 (H1058)	Asim 13/12
22	WASID ALI	J044 H.c1035	Wasid 13-12-16
23	SAJID MAHMOOD	J425 HC1016	Sajid 13-12-16
24	Mohammed Siddique	J235 H/C1022	M. Siddique 13-12-16

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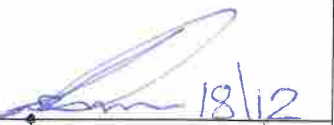


	Name	Badge Number/ Number plate	Signature & Date
25	YASAR MAHMOOD	J5251 1037	 13/12/16
26	WASIM IQBAL	J511 H/c 1014	14/12/16 
27	KAMRAN MASEEB	J466 H/c 1057	14/12/16 
28	I. KHLAQ	J1214 H/c 1024	I. Aneed 14/12/16
29	M. YASIN	J219 014	 - 14/12/16
30	A. MAHMOOD	J162/1038	 14/12
31	JAWED IQBAL	J234 H/c 022	 15/12/16
32	M. ASAIB	J105 - 065	M. A. Iqbal 15/12/16
33	A. RASHID	J052 - 1043	 15/12/16
34	A. YUNUS	H038 008	A. Yunus 15/12/16
35	A. FAROOQ	J. 505 - 021	 15/12/16
36	W. AKHTAR	J073 - 054	

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Name	Badge Number/ Number plate	Signature & Date
37) Ghulam Rasool	J 408 (006)	 15/12/16
38) NASIR AFZAL	J 461 1054	 15/12/16
39) IMRAN GHANI	J 453 HC 1040	 15/12/16
40) M. AYUUB	5134 HC 1023	M. AYUUB 15/12/16
41) T. MEHMOOD	J 412 HC 033	
42) M. HUSSA	J 0225 HC 1048 61 ABBEY Bldg	1048  16/12/16
43) M. HUSSA	J 140 HC 1045	1045  16/12
44) M. YOUNIS	H 022 HC 055	16-12-16 M. YOUNIS
45) J. I. KAYANI	J 138 018	16/12/2016 
46) M. AKHTAR	J 204 H 009	16-12-2016 M. Akhtar
47) SHAHNAZ SPID	J 091 H 024	16-12-16 
48) ARSHAD M. AHMAD	J 075 1017	16.12.16 

M. Ahmad

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Name	Badge Number/ Number plate	Signature & Date
(49) Sajjad	J101 1052 J103	S. Hussain 16-12-16
(50) SALIM	J143 H045	H. Saleh 17/12/16
(51) KHAJIKHA	H/C28 (Plate) BX62 MC002	B.M.  17/12/16
(52) TALIB HUSSAIN	J065 H007	 17/12
(53) Mohamed ABU	J308 HC1055	 17/12
(54) ZAHMAN	J370 H/C057	 17/12
(55) A. Mahmood	J018 HC1016	A. Mahmood 17/12
(56) M. ASLAM	J049 035	M. ASLAM 17/12
(57) RASOOL SHAH	J090 H/K 47	R. Shah 17/12.
(58) Ahsin Shah	J289 020	 18/12
(59) M. ISHTIAQ	J508	 18/12
(60) SABIR HUSSAIN	J125	 18/12

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Name	Badge Number/ Number plate	Signature & Date
61 SHAFIQ	J113 52	 18/12/16
62 ZAHEER AHMED CHAUDHRY	J397 062	Zaher 18/12/2016
63 MOHAMMED IQBAL	H042	M. Iqbal 18/12
64 MOHAMMAD RAZA	J087 H/c009	M. Raza 18/12
65 MOHD MAZID	J095 H/c060	MAZID 19/12/16
66 ZAFAR ISBAL	J062 H-c 059	Zafar 19/12/16
67 MAHAMMAD RAZA	J061 H/c 030	19/12/16 M. Raza
68 A. MAHMOOD	J016 J106 / 026	A. Mahmood 19/12/16
69 FAZAL KARIM	H/c037 J055	Fazal Karim 19/12/16
70 MOHAMMAD ASHRAF	J120 H/c 1005	J120 19/12/16 H/c 1005