

**APPENDIX 1  
TRADE GROUP CONSULTATIONS**

**SOUTHAMPTON HACKNEY ASSOCIATION**

**14<sup>th</sup> April 2009**

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**For the attention of Mr Phil Hall – Enforcement Officer**

**Dear Mr Hall,**

I would like to thank you and Mr Black for inviting myself and Vice Chair, Steve Paul (SHA) at the informal consultation meeting held at Southbrook Rise, March 16<sup>th</sup> 2009 at 9.30 AM.

I have now received Mr Black's letter dated 30<sup>th</sup> March 2009 with regards to certain matters intending to improve standards and safety for the taxi trade to be considered by the Licensing Committee on the 6<sup>th</sup> May 2009. In my capacity as Chair of the SHA, I have spoken to many members of our association to obtain their thoughts on these items. The views of the SHA committee are included as well.

With regards to Item 1 B. Tech qualification for all drivers, it is unanimous that all new drivers should complete this exam. There is a mixed response from older more established drivers as to why should we take an examination – 'we know mostly everything!' I have tried to explain that this is not the case quoting to them the situation that happened with the Bournemouth taxi drivers with regards to the court case; I think it would be fair to say that some have never taken an exam of this sort so they are concerned as to what is involved and others are worried about the cost. Hopefully as time goes on, more information will be available to our trade on this subject but all drivers will have to get used to the fact that at some stage if they want to pursue a taxi career, they will have to take this exam.

Item 2 Driver Assessment - A must to improve standards and if a driver has amassed a large number of points, he should also be given a test.

Item 3 Engine Size – The current limit of 2002 is out-dated and it needs to be amended.

Item 4 Testing of Vehicles – We have had it explained to us in the past why Southampton City Council (Licensing Department) uses First Bus at Portswood for the yearly compliance test. It would appear sometimes that this particular MOT station takes on too much work and the examiners are not always consistent in what vehicles they fail or pass, depending on who the taxi owner might be. It is in our opinion that it may be a good idea to use another MOT testing station as well as Portswood for our yearly compliance test. To introduce twice yearly testing in an effort to improve standards and safety is of paramount importance but surely on a brand new vehicle, the government states that you don't have to have a MOT for 3 years; therefore we feel that the twice yearly test would not be applicable. Surely more roadside checks conducted throughout the year might help solve this problem with VOSA and the police in attendance? If we are to have twice yearly testing, can we not lengthen the period that a saloon car taxi or a purpose built/adapted vehicle can stay on the road?

Item 5 Vehicles Specification – we have no problems with this item.

Item 6 Digital Cameras – This has become a very controversial issue. Although the safety of a night-time driver is very important, we have encountered some questions raised by our members. When you change your taxi it is down to us as individuals to pay to have the camera taken out and re-installed, some drivers are not happy about this. If you are a day taxi driver and you are the only person on the car, you may start and finish off your day with a school run and do a few jobs in between, why should you want a camera fitted? Personally, I have no problem with cameras' but can understand the other drivers' concerns.

As an association we will endeavour to support our members, who are predominantly independent taxi drivers (not on a radio circuit) and will consult and formulate policies with the Licensing Department.

**Yours sincerely,**



**Ian Hall**  
**Chairman of SHA**

16, Henry Rd  
Southampton  
SO15 3HA

10 April 2009

Mr. R. Black

Ref RB/LL

**CONSULTATION**

Dear Sir,

I am writing for further information on behalf of my members

**Regarding your letter dated 30 March 2009;**

1] You state that Government has indicated that B Tech Qualifications " will become compulsory for all hackney carriage and private hire drivers by 2011." Please could you refer me to the documentation that this came from. We have searched and can find nothing stating this, and in any case the Government is likely to change next year.

Why do you insist upon a B Tech qualification as opposed to a NVQ?

2] It is obviously the case that lack of enforcement and inadequate topography testing has led to the current situation.

Why do you think that sitting the Institute of Advanced Motorists course is not a better and less costly option for new drivers, and for yourselves?

.3] A comment from a member is " I suppose they want this so that taxi's can speed past queuing traffic to get to waiting customers in the Docks." Seriously though, I'd have thought torque more important. But why is this being raised and could you forward supporting documentation please.

4] Presumably you have analysed accident statistics and other relevant information to come up with this proposal. Again, could you forward details please

5] The state of the roads in Southampton is a major contributing factor to loss of wheel trims etc. because for many years the council has slashed the road maintenance budget.

6] How does this currently work in the city? Could you explain exactly please.

A worry is that more and more they will be used as a spy in the cab and not to prosecute customers



**Summary**

Dave Griffiths has replied in a letter stating his reservations about this 'consultation.'

To enable us to be in a position to respond properly we need the information requested.

We will be discussing your letter and our presentation to the Licensing Committee at our Branch meeting on Tuesday 21 April, so if it is possible to reply to this letter before then it would be appreciated.

Yours sincerely,

Steve Fricker

Branch Sec Southampton UNITE Cab Branch SE 621

Mr D Griffiths  
53 Warren Avenue  
Southampton  
SO16 6AH

**Richard Black**  
**Licensing Officer for Solicitor to the Council**  
Southampton City Council  
Southampton  
SO15 1YG

9<sup>th</sup> April 2009

Dear Mr Black,

**Re: Your letter of 30<sup>th</sup> March 2009 'Consultation' Ref: RB/LL**

I do not consider the letter to be very concise. Neither do I consider it to be part of a meaningful consultation exercise between Southampton City Council and interested stakeholders. My reasons for these opinions follow:

**Timescale:** The period between the receipt of your letter and the completion date 14<sup>th</sup> April 2009, will not enhance the quality of responses. It does not conveniently allow for trade associations to consult with its members thus enabling a draft response from those associations.

**Scope and Impact:** Because of the above, your letter does not allow adequate room to influence any decision. Estimated individual costs of the proposals under consideration do not seem to be an integral part of the 'consultation exercise'.

**Responses:** Meaningful consultation normally takes input from written responses, discussions forums and/or meetings. A summary of the responses should also be made available to interested stakeholders before any further action.

**Understanding:** Because of the absence of the other avenues of consultation – discussion forums and/or meetings – some of the proposals are unclear and not self-contained and therefore lack transparency and openness.

Finally, I have not submitted a written response to the proposals, as I will make representation to the Licensing Committee on 6<sup>th</sup> May 2009. Unfortunately – as others may well do the same - this will burden the Licensing Committee's time regarding this 'consultation'.

Yours truly,

Dave Griffiths

**Sent Attached to email**  
**Cc. All Members of Licensing Committee and Steve Fricker**



**APPENDIX 2****SYNOPSIS OF CONSULTATION DOCUMENTS**

	Positive	Negative	No Opinion
1. B-Tec Qualification	26 (63%)	12 (30%)	3 (7%)
2. Driver Assessment	31 (76%)	7 (17%)	3 (7%)
3. Engine Capacity	20 (50%)	13 (31%)	8 (1%)
4. Testing of Vehicles	12 (29%)	28 (68%)	1 (3%)

5. Vehicle Specification	23 (56%)	9 (22%)	9 (22%)
6. Cameras	18 (44%)	17 (42%)	6 (14%)

## **Breakdown of Data**

A total of 41 Consultation response forms have been received as of 17<sup>th</sup> April 2009. The responses have been allocated into 3 categories for recording purposes; Positive, Negative and No opinion. The responses have been analysed to identify any themes that appear among the comments and these are shown below.

### **1) B-Tec Qualification**

Of the 26 positive responses, 10 indicated that although they agreed with the proposal, the B-Tec should only be required for newly licensed drivers, not existing drivers with experience.

Of the 12 negative responses, 4 indicated that they felt it was not necessary for drivers already in the trade. 2 indicated that a training course would be suitable, but that a qualification was too much.

### **2) Driver Assessment**

Of the 7 negative responses, 2 indicated that the time that an applicant has held a full UK driving licence should be increased instead of introducing a driver assessment.

### **3) Engine Capacity**

No common themes have been identified.

### **4) Testing of Vehicles**

Of the 12 positive responses, 3 raised concerns regarding the cost implications associated with a second test.

Of the 28 negative responses, 12 raised concerns regarding the additional cost that would arise.

### **5) Vehicle Specification**

Of the 9 negative responses, 2 were concerned about the cost implications. 4 indicated that this would be restrictive in improving appearance of the vehicles. 1 suggested that there would need to be an exception for wheelchair accessible vehicles as these are not adapted by the manufacturers.

## **6) Cameras**

Of the 18 positive responses, 5 indicated that although they agreed with the proposal, they had concerns over the cost implications, with 3 indicating that it should not be necessary for those doing restricted work only.

Of the 17 negative responses, 5 raised concerns regarding the cost. 7 suggested that it should not be compulsory, but rather be left to the driver's discretion. 2 indicated it would not be needed by drivers working daytime or carrying out restricted work.