



*& CONTRACTS REDDITCH LIMITED*



Dear Sir/Madam

As a local Private Hire Operator, operating in the Borough of Redditch and having successfully served the public of Redditch for the past 20 years, several issues have arisen in regards to Vehicle Licensing which I feel I must stress and put forward to yourself for deliberation.

As members of the committee you have the responsibility of making decisions and acting in the best interest of all parties involved. In this case, making the right decision will be in the interest of not only Redditch Borough Council, but also for the public of Redditch as well as the local private hire companies providing public transport. As a result I would like to think you will agree with my points and look to change existing legislation regarding the licensing for private hire vehicles.

Under the existing licensing rules governing vehicles with tail lift capabilities, it currently requires the operator to purchase a vehicle that is not more than 6 years old and to have this vehicle inspected on a 6 monthly basis at the cost of the operator. I feel this is possibly adequate for normal vehicles which do not operate tail lifts for the reason being that these types of vehicles are used regularly on a daily basis and as a result require more maintenance to be road worthy for public transport. However, applying this same rule to vehicles which operate tail lifts specifically for wheelchair access I feel is penalising not only the operator but also those who use the service. These types of vehicles only have a specific use which is to serve all those members of the public who are wheelchair bound. As a result these types of vehicles are not used on a regular basis and therefore have less wear and tear put on them.

These types of vehicles, as logic tells us, are more expensive to purchase, operate and use for the simple rule that a lot of modification has to be done to make them fit for the purpose of use. As mentioned before these types of vehicles are not operating on a regular basis and therefore accumulate less mileage over a term compared to that of a normal private hire vehicle. My question to yourself is: As an operator of a private hire vehicle or a member of the public would you feel safe in operating/travelling in a vehicle which is less than 6 years old but because of its constant use has accumulated a lot more miles and therefore has a tendency to be less reliable or would you prefer to operate/travel in a vehicle which is that bit older but despite it being older than 6 years and because of the fact that it is not used constantly therefore has not accumulated much mileage and therefore requires less maintenance taking away the risk of breaking down regularly?

I feel the rule that all vehicles should be less than 6 years old should only apply to vehicles which do not operate tail lifts as for reasons stated above. As for vehicles fitted with tail lifts I feel this rule should be relaxed as these vehicles are expensive to purchase, maintain and operate as they are only used for a particular type of customer.

Having spoken to different vehicle maintenance engineers at various depots including the Councils cross-gate road depot, everybody shares the same view as I and I hope you will too. The fact that because a vehicle is younger than 6 years old but used regularly does not make it any better than a vehicle which is 10 or 12 years old and hasn't been used so regularly and as stated these are views shared by experts in vehicle maintenance. I ask what is the council requiring Quality or Quantity?

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Surely, when putting a vehicle in front of a committee, the professional, independent opinion of a mechanic, if not your own at the Crossgate Depot, should be considered. How can a vehicle be judged **not** roadworthy based upon its age yet still pass the councils very own stringent MOT test with flying colours?

On this same note I am also aware that the Council operate its own vehicles within the borough. The Dial a Ride scheme is offered by the council for the elderly residents of Redditch. I understand that the Dial a Ride vehicles were recently replaced by a new fleet which has not resulted in better operations as these 'newer' vehicles to my knowledge have not been very reliable. In fact they have spent more time off the road in their short lifespan than the previous fleet. So newer is not always better, is it? Surely properly maintained vehicles, regardless of age are better than unreliable vehicles.

As a result I also feel that as the governing body of a local borough you are penalising the general public: specifically those who are disabled by such a ruling. Obviously these tail lifts are used only by wheelchair bound non ambulant customers. Considering the fact that these vehicles are considerably more expensive to purchase, maintain and operate, operators are showing a reluctance to purchase these vehicles as it is not feasible for them and as a result it is penalising its users. Is this what the council wants? I feel and share the same views as the council regarding safety as well as portraying a good image of Redditch transport but we as operators can only continue to do this if it is feasible for not only us but also the public.

Last but not least, I mentioned earlier that as committee members it is your duty to act in the best interest of all parties involved. I have pointed out how such a ruling affects the operator and the public and hopefully you will by now share the same view as me but there is another party this is also affecting, the Borough Council its self. Currently I can take any vehicle which operates a tail lift to a DVLA test centre and have that certified as a PCV (Passenger Carrying Vehicle) and have it licensed for a period of 12 months at a cost of £170 per year and operate it in the borough without any restrictions. However the borough council require you to have a vehicle inspection on a vehicle twice a year if the vehicle is younger than 6 years old and 3 times a year as it gets older all at the cost of approximately £400+ per year. My question to you is why is the borough council intent on losing revenue which it could help towards its cost cutting?

Finally, I would like to take this opportunity to sincerely thank you for taking the time to read my concerns and I sincerely hope you will deliberate on this with the view of changing existing legislation to make it fair and more beneficial to all parties involved.

Should you wish to discuss any points raised in more detail please do not hesitate to contact me and I would be happy to discuss further.

Yours Faithfully

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