## Anya Pyke

From:

R and K Cars

Sent:

19 November 2015 11:00

To:

Licensing

Subject:

Re: CONSULTATION on Review of the Statement of Licensing Policy

## Dear Licencing team

thank you for your response

However, although i think the change in the wording of the licencing policy is a move in the right direction, it does not address the main problems with providing disabled members of the public with access to public transport and specifically taxis

Having extensively researched the requirements of taxis as wheelchair accessable vehicles (before conversion of our latest vehicle), i have found that less than 5 of the vehicles currently licenced for hire in Winchester would meet the requirements of most other authorities. While the manual for vehicle category M1 (link provided by yourselves) covers seat belt anchorages and fixing of seats (and a lot of other irrelevant information) there are no recomendations for access width and height, head height when travelling, floor space allocated to the wheelchair user, space allocated for luggage which is separated from passengers, step heights, all of which i am sure you will agree are vital for disabled taxi users. Most licencing authorities give strict dimensions which are required to be complied with, instead of arbitary and discretionary limits decided on the stop by yourselves.

The hackney taxis which all fall far short of the requirement to carry wheelchairs fail mainly by having less than 1000mm floor length available. Many have multiple seats where the wheelchair would be positioned, with drivers that are incapable of removing them, while others have insufficient height or width available to access the vehicle. I would suggest that it is a requirement that drivers be able to take a wheelchair passsenger within 2 minutes as they were licensed to so do.

The tightening of the regulations will give no benefit to wheelchair users unless, unsuitable vehicles are removed from the ranks and replaced by proper vehicles fit for purpose. We also have 48 vehicles that are licenced as hackneys that make no provision for disabled access at all and this has been the case for over 20 years. When will these vehicles be brought into line with the regulations you are tightening on the remainder of the hackney vehicles you currently licence?

Best regards Tim King