

**Manchester City Council  
Report for Resolution**

**Report to:** Licensing and Appeals Committee – 23 October 2017

**Subject:** To Consider the suitability of vehicles to be licensed in Manchester as Hackney Carriage(s)

**Report of:** Head of Planning Building Control and Licensing

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**Summary**

To request the Licensing and Appeals Committee (**the Committee**) to consider the matter detailed within **Appendix 1** attached to this report.

**Recommendations**

That the Committee consider the contents of this report, anything said at the hearing and the matters contained within **Appendix 1** relating to representations from individuals wishing the Committee to consider the suitability of vehicles to be licensed in Manchester as hackney Carriage.

**Wards Affected: All**

Community Strategy Spine	Summary of the contribution to the strategy
Performance of the economy of the region and sub region	Any change in relation to the type of vehicles that may be licensed as a hackney carriage will open the market up to additional vehicle manufactures and vehicle/vehicle part suppliers
Reaching full potential in education and employment	It is unlikely that any change to the type of vehicle that may be licensed will increase employment due to the current limit on the number of hackney carriage vehicle that can be licensed. However it may increase employment in relation to individual vehicle suppliers and associated vehicle maintenance and suppliers of parts, as they may gain an increase in the market, however this is likely to impact on manufacturers of vehicles currently licensed
Individual and collective self-esteem – mutual respect	Any change in relation to the type of vehicles may impact on individuals who have difficulty in accessing/egressing from hackney carriage vehicles. Consideration should be given to the cost of a vehicle to proprietors, and any resultant impact on the available facilities in vehicles for individuals with disabilities

Neighbourhoods of Choice	There is potential opportunity for the Council to reduce impact on air quality, by requiring hackney carriage vehicles to meet and maintain a higher level of vehicle emission standards. .

**Full details are in the body of the report, along with any implications for:**

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

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**Financial Consequences – Revenue - None**

**Financial Consequences – Capital - None**

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**Background documents**

Report of Licensing and Appeals Committee 10 June 2013  
Report of Licensing and Appeals Committee 2 July 2013

## **1. Background**

- 1.1 In 2012 the Council responded to an announcement, that the then Maganese Bronze Holdings (the manufacturers of bespoke London Taxis) had gone into administration, by requesting a review of Hackney Carriage Vehicle Licensing.
- 1.2 On 10 June 2013 the requested report was submitted. The report informed members of the findings of the review during a twelve week consultation exercise. The exercise included:
  - A twelve week consultation, with vehicle manufacturers and hackney carriage proprietors in relation to the Transport for London (TFL) conditions of fitness.
  - An open day (vehicle roadshow) that allowed members of the public including a number of persons with disabilities to access/ egress and give feedback on a variety of vehicles that could potentially be considered by the Committee as being suitable to be licensed as hackney carriage vehicles.
- 1.3 The decision of the Committee was that
  - Transport for London (TFL) Conditions be abandoned and a Manchester standard adopted
  - Vehicles must be fitted with a swivel seat
  - Light transmission through a front window is not less than 75%, side door glass is not less than 70% and remaining glass (except rear window is not less than 70%
- 1.4 The new Conditions of Fitness (CoF) were later (2013) incorporated into the current Hackney Carriage Vehicle Policy.
- 1.5 The Conditions of Fitness (COF) set out the conditions of fitness in force in Manchester, which took effect on 9 October 2013.
  - 1.5.1 The Conditions allow the Council to make amendments to the COF should there be situations that require it, such as amendments to national or international laws with respect to road vehicles or air quality. These may include, for example, changes arising from disability legislation or the implementation of European emissions and air quality laws, or changes to taxi licensing legislation.
  - 1.5.2 The conditions state that:-
    - No vehicle will be licensed as a hackney carriage vehicle unless it is fit for purpose and conforms to the requirements in this document.
    - The Council can exempt a vehicle from those requirements after a request by an applicant and where, having regard to the exceptional circumstances, it considers it reasonable to do so.

- This document incorporates relevant policies relating to the licensing/following the licensing of a vehicle as a hackney carriage. Proprietors should consider this document prior to submitting an application for a Hackney Carriage vehicle proprietor licence.

## **2.0 Vehicles Currently Licensed in Manchester as Hackney Carriages**

2.1 There are currently 1090 hackney carriage vehicles licensed in Manchester. The Council restricts the number of hackney carriage licenses and controls the number of vehicles licensed by a method of 'managed growth'.

2.2 Any vehicle being licensed as a hackney carriage in Manchester, must be wheelchair accessible. Such vehicles are higher in cost than a normal saloon vehicle. The running costs of the vehicles are calculated using the Halcrow Manchester Formula and are compared year on year. These costs inform the revision of fares.

## **3.0 Types of Vehicles currently licensed as hackney carriage vehicles and their compliance with the CoF.**

3.1 London Taxi Company

3.1.1 There are currently 845 bespoke London taxi Cabs, all of which are compliant with the current Manchester CoF

3.2 Mercedes Vito Taxi

3.2.1 There are currently \*122 Mercedes Vito taxi's licensed. The Mercedes Vito did not comply with the new CoF and the Committee decided to give adequate time for the vehicle to comply with the CoF. The Council continued to licence vehicle applications in relation to Mercedes Vito Taxis until 10 January 2014 and after that date any new/replacement vehicles required a swivel seat fitted. Any already on fleet prior to this date were given grandfather rights.

3.2.2 Mercedes M8 SE- No longer available

There are currently \*8 Mercedes vehicles licensed. These vehicles are compliant with the current Manchester CoF in so far as they have been retrofitted by Allied with swivel seats.

*\* Due to data inputting and the introduction of a new computer system there is uncertainty as to the numbers of the different types on Mercedes and it would require an officer to go into each of the 122 records to ascertain the correct make and model of vehicle had been inputted. For the purpose of this report the figures have to be accepted as they are*

3.2. Peugeot E7 SE XS Model – No longer available

- 3.2.1 There are currently 183 Peugeot E7 SE vehicles licensed.  
When purchased new, the vehicles had a swivel seat fitted and complied with the Manchester CoF. Allied retrofitted swivel seats into older Peugeot E7's but only offered this service if the vehicle was purchased from them. Mr Guiliat, from Allied, explained that this was for the following reasons: "we don't have the available resource or time to retro fit the seats into vehicles bought elsewhere ie auctions, ebay etc. It is also a risky procedure where it is possible to break the floor and end up being very costly. Only we can source, supply and fit these seats due to the ECWVTA. (European Community Whole Vehicle Type Approval)"

### 3.3 Metro Cabs

- 3.3.1 There are 2 Metro Cabs currently licensed.
- 3.3.2 The Metro Cab was never designed with a swivel seta and the two on fleet have been licensed for some time and have 'grandfather rights'.

## 4.0 Legal Considerations

- 4.1 Although this matter does not relate to an 'application' the hearing should be conducted as though it were and the rules of natural justice should apply.
- Make the decision in accordance with the rules of natural justice.
  - Ensure the hearing is fair and that there is no actual (or perception of) bias or pre-determination.
  - Determine how the hearing will be conducted, and may adjourn the hearing if necessary.
  - Give reasons for the decision either at the hearing or in any case in writing as soon as reasonably practicable after the hearing.
- 4.2 Individuals will be given an opportunity to speak at the meeting. The Chair will determine, based on the number of person who wish to speak, how long each individual will be given.
- 4.3 As these determinations are not in connection with an application any decision by the Committee cannot be appealed to the Magistrates Court. There would however be a challenge by way of Judicial Appeal.

## 4.0 Contributing to the Community Strategy

- 4.1 (a) Performance of the economy of the region and sub region

Any change in relation to the type of vehicles that may be licensed as a hackney carriage will open the market up to additional vehicle manufactures and vehicle/vehicle part suppliers

- 4.3 (b) Reaching full potential in education and employment

It is unlikely that any change to the type of vehicle that may be licensed will increase employment due to the current limit on the number of hackney carriage vehicles that can be licensed. However it may increase employment in relation to individual vehicle suppliers and associated vehicle maintenance and suppliers of parts, as they may gain an increase in the market, however this is likely to impact on manufacturers of vehicles currently licensed

4.4 (c) Individual and collective self-esteem – mutual respect

Any change in relation to the type of vehicles may impact on individuals who have difficulty in accessing/egressing from hackney carriage vehicles. Consideration should be given to the cost of a vehicle to proprietors and any resultant impact on the available facilities in vehicles for individuals with disabilities.

4.5 (d) Neighbourhoods of Choice

There is potential opportunity for the Council to reduce impact on air quality, by requiring hackney carriage vehicles to meet and maintain a higher level of vehicle emission standards.

**5.0 Key Policies and Considerations**

5.1 (a) Equal Opportunities

5.2 There are no equal opportunities issues arising from this report.

5.3 (b) Risk Management

5.4 As with any such decision made by the Council it can be challenged by way of 'Judicial review'.

5.5 (c) Legal Considerations.

5.6 There are no additional legal considerations to those already highlighted within this report.

**6.0 Conclusion**

6.1 The Committee are requested, having regard to the contents of this report, and anything said at the meeting, to determine the matter as detailed within **Appendix 1** attached to this report.

**Manchester City Council  
Report for Resolution**

**Report to:** Licensing and Appeals Committee – 23 October 2017

**Subject:** Request the consideration of a Ford Tourneo Custom (Ford Pro Cab) to be licensed as a hackney carriage in Manchester.

**Report of:** Head of Planning Building Control and Licensing

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**Summary**

This report relates to the request for the Committee to consider the licensing of a Ford Pro as a Hackney carriage Vehicle. Any vehicle must comply with the current Manchester Conditions of Fitness, unless the Council exempts a vehicle from those requirements after a request by an applicant and where, having regard to the exceptional circumstances considers it reasonable to do so.

**Recommendations**

Taking into consideration:

- the contents of the overarching report
- the content of this Appendix 1 report
- any representations at the meeting

The Committee are asked to consider whether the Ford Tourneo Custom (Ford Pro Cab) is suitable to be licensed as hackney carriage vehicle in Manchester.

## 1.0 Introduction

- 1.1 The Council currently have a Hackney Carriage Vehicle Policy that includes a 'Conditions of Fitness (CoF). Any new vehicle being licensed as a hackney carriage vehicle in Manchester must comply with the CoF.

1.1.1 The policy states that:

No vehicle will be licensed as a hackney carriage unless it is fit for purpose and conforms to the requirements in this document, unless the Council exempts a vehicle from those requirements after a request by an applicant and where, having regard to the exceptional circumstances considers it reasonable to do so.

- 1.2 The Council deals with any requests for new make and models on fleet to be dealt with as follows:

- A completed Vehicle compatibility questionnaire must be submitted which advises the Committee if the vehicle fully complies or not with the current Manchester CoF
- A vehicle (of the exact make and model as stated in the questionnaire) must be available for the Committee to view at the meeting.
- Where the form has not been submitted as an application, there is no appeal of any decision to the Magistrates Court. Any decision can be challenged by way of judicial review.

## 2.0 Background

- 2.1 On 15 September 2017 Allied Vehicles of Glasgow submitted a vehicle compatibility questionnaire (**attached at Appendix 1A**) for a Ford Tourneo Custom (Ford Pro Cab), together with documents relating to the ramp and steps.

- 2.2.1 The questionnaire reflects the content of the Manchester CoF.

- 2.3 The questionnaire advises that the vehicle in question complies with most of the CoF except in the following areas.

Question 13Kb (v) – Are anchorage restraints for the safe stowage of a wheelchair when not in use, whether folded or otherwise.

Response: Anchorages are not provided for a wheelchair when not in use.

Question 13(f) (1) (iii) and 13 F(2) (1V)– Where the top of the tread for any entrance is at floor level of the passenger compartment, does it comply with the following requirements:

- Has a band of colour across the entire width of the edge which shall contrast with the remainder of the tread and floor covering;



- Has a band of colour across its leading edge which shall contrast with the remainder of the step and floor covering.

Response: Band of florescent yellow can be added on edge of step specifically for Manchester.

Question 15c (i) If the vehicle is fitted with a sliding window on the glazed partition, is the maximum width of the opening more than 11.5cm.

Response: No sliding window if fitted, Part of partition is cut out – measuring 10cm; enough space for payment to be made.

2.4 The applicant has been asked to provide the required approvals for the vehicle, including those required for the swivel seat. An e-mail has been received from Allied which states (verbatim):

We currently have the full ECWVTA for the Ford Pro Cab as it stands (without the swivel seat). I have attached.

However, we have been working on updating this; to include the swivel seat and a number of other items which have been updated on the ProCab (all of which will benefit your drivers in Manchester; such as an overhead pod for the intercom and driver controls). This process has been going on for the past couple of months and we hope to have the updated certification back by mid to late November. Obviously, I have stressed that this is not ideal and I have been pushing for it to be done before our committee date with yourselves... but I have been assured it is not an easy process and costs thousands of pounds to complete/add extras on to the certification, of which can take months to get signed off/clarified.

I also discussed with Donald yesterday, who said to be honest and explain the above to yourself; he is confident by the time we have gone through the committee process we will have the paperwork and be good to go.

2.5 If the Committee were to accept this vehicle on fleet it would be on the proviso that all required certificates were received, prior to any applications being made.

### **3.0 Officer Summary**

3.1 The vehicle complies with most of the requirements of the CoF and, where there is non-compliance we are advised that they can be easily overcome.

3.2 The following questions and officer response may assist the Committee in considering some of the issues:

3.2.1 The cost of wheel chair accessible vehicles, fitted with a swivel seat to proprietors?

Response: Manchester has a policy that requires all hackney carriage vehicles licensed in Manchester to be Wheel Chair Accessible. There is no doubt that these vehicles are costly. The Council takes this into consideration by looking at the annual running costs of the vehicles, which in turn informs the hackney carriage fare review.

A comparison of running cost of vehicles will be made available at the meeting.

3.2.2 What vehicles are currently available to be licensed as hackney carriages in Manchester?

Response: Manchester currently has a mixed fleet of vehicles made up of 845 London Taxi Company TX Models, 122 Mercedes Vito Taxis, 8 Mercedes M8 SE, 183 Peugeot E7 SE and 2 Metro Cabs.

Of those currently licensed models currently available are the London Taxi Company TX Models.

3.2.3 At the time of writing the report there are 2 new vehicles that are currently being made available on the market:

Ford Tourneo Custom (Ford Pro Cab) (provided it complies with all Manchester CoF) as detailed within this Appendix and London Taxi Company -TX 6 Electric vehicle, which is available to order now to be on the road by November 2017.

3.2.4 The trade have questioned whether a swivel seat is necessary 'must' in Manchester licensed hackney carriage vehicles. Trade representatives have stated at meetings that drivers have said that swivel seats are not used. This does not mean that they should not be available. A comparison is any new building has to have toilets for use by disabled person regardless if they are used or not.

Response: London Taxi Company were asked for their comments in relation to the 'swivel seat', which is also available in the new TX6. A letter was received from London Taxi Company and is attached at **Appendix 1B**

3.2.5 It is important that the Committee considers not just the trade request but also takes into consideration the thoughts of 'disability groups.

To ensure the Committee have a balanced view Sebastian Lynn who will be in attendance at the meeting representing the GMCDP (Greater Manchester Coalition of Disabled People). Sebastian will be able to view the vehicle question and provide feedback.

3.2.6 One of the Considerations that the Committee may wish to consider is a percentage of vehicles that do not fully comply with the CoF?

Response: If every future vehicle licensed was a Mercedes Benz – Vito Taxi CDI Compact 114 Blue Tec, this would mean the disappearance of a facility the (swivel seat) that is provided for use by persons who cannot easily access and egress a vehicle.

The Committee may wish to take into account

If a further percentage of the fleet could be made up of different types of vehicles, which may or may not comply with the Manchester CoF. The current fleet has 14.7% of vehicles that do not comply with the Manchester CoF in terms of the availability of a swivel seat and 37.3% (including the 14.7%) are vehicles that are not bespoke London taxi Cabs.

What would that percentage be and how can it be calculated/Managed? There are a number of alternative vehicles that could be licensed, which would not comply with the Manchester CoF i.e. Mercedes Eurocab, Peugeot Euro 7 Taxi, Fiat Eurocab electric. Would the Committee also have to consider allowing any of these vehicles on as part of an overall percentage of different types of vehicles?

#### **4.0 Conclusion**

- 4.1 Members are requested to consider the content of **Appendix 1**, the information in the Overarching report and anything said at the meeting.

## APPENDIX 1A FORD.



MANCHESTER  
CITY COUNCIL

### Conditions of Fitness – Vehicle Compatibility Questionnaire

#### Applicant Details

Name of Applicant	Allied Vehicles	
Address of Applicant	230 Balmore Road, Glasgow,	
Post Code	G22 6LJ	
Contact Details	Telephone	07817 008324
	E-mail	lucy.bradley@alliedvehicles.co.uk

#### Vehicle Details

Make	Ford	
Model	Tourneo Custom	(Ford ProCab)
Year of Manufacture	n/a	
Registration Number	n/a	

Please complete all questions in the document by ticking the appropriate box. If your vehicle does not comply to the standard and/or you have answered 'no', to a question, please provide a full explanation on the sheet provided at the end of this document.

#### Completed forms should be returned to:

Ann Marku  
Principal Licensing Officer  
Taxi Licensing Business Unit  
Neighbourhood Services  
PO Box 271  
Manchester  
M18 8YU

Or via email: [taxi.licensing@manchester.gov.uk](mailto:taxi.licensing@manchester.gov.uk)

General construction				
1	Does your vehicle comply with:			
a.	All respects with the requirements of the Motor Vehicle (Type Approval) Regulations 1980	Yes	No	
b.	The Motor Vehicle (Type Approval) Regulations (Great Britain 1984)	Yes	No	
c.	The Motor Vehicles (EC Type Approval) Regulations 1998 and with any further national or international legislation as may be applicable.	Yes	No	
d.	The Road Vehicles (Construction and Use) Regulations 1986 (C & U).	Yes	No	
e.	All respects with British and European vehicle regulations and be "type approved" to the requirements of the M1 category of European Whole Type Approval Directive 2007/46/EC as amended.	Yes	No	
f.	Note: If your vehicle has not been "type approved" to the M1 category (e.g. conversions) can you provide approved certification that the specific vehicle meets the requirements of that category?	Yes	No	N/A
2	Can the vehicle facilitate the carriage of disabled persons and is it capable of accommodating a disabled person in a DfT reference wheelchair in the passenger compartment?	Yes	No	
3	Does the vehicle comply with Manchester City Council age policy? View the policy online <a href="http://www.manchester.gov.uk/downloads/download/4346/emissions_and_age_policy-phhc">http://www.manchester.gov.uk/downloads/download/4346/emissions_and_age_policy-phhc</a>	Yes	No	

Steering				
4	Is the steering wheel on the offside of the vehicle?	Yes	No	

Modification/additional equipment				
5a	Has the vehicle been fitted with any equipment, other than those approved to either the inside or the outside of the vehicle	Yes	No	
5b	Are any modifications going to be carried out to the vehicle. If 'yes' this must be accompanied by appropriate information from the vehicle manufacturer that the modifications can be accomplished	Yes	No	

	without compromising the vehicle specification.			
Tyres				
6a	Do all tyres comply with the relevant legislation? Specifically, re-tread tyres must comply with BS AU 144E as amended and be marked accordingly.	Yes	No	
6b	Are the tyres of the designated size, speed and weight rating for that make and model of vehicle as prescribed by the vehicle manufacturer?	Yes	No	

Brakes				
7	Does the vehicle have an anti-lock braking system fitted?	Yes	No	

Interior Lighting				
8a	Is the vehicle fitted with adequate lighting for the driver and passengers?	Yes	No	
8b	Is the vehicle fitted with separate lighting controls for both passenger and driver?	Yes	No	
8c	Does the passenger compartment have an illuminated control switch fitted, which is within reach of wheelchair passengers?	Yes	No	
8d	Is lighting provided at floor level to each passenger door, which is activated by the opening of the doors?	Yes	No	

Electrical Equipment				
9	Does any additional electrical installation and/or after-market components, to be used within the vehicle, meet the requirements of the relevant Automotive Electro Magnetic Compatibility (EMC) Directive, as amended, and is it marked accordingly?	Yes	No	

Fuel Systems				
10a	Does the vehicle have a device provided whereby the supply of fuel to the engine may be immediately cut off?	Yes	No	

10b	If a manually operated device is fitted, is the location together with the means of operation and "off" position clearly marked on the outside of the vehicle?  <i>In the case of a vehicle fitted with an automatic inertia fuel cut off switch, no markings are required.</i>	Yes	No	N/A
10c	If the engine is powered by liquid petroleum gas (LPG), compressed natural gas (CNG), liquid natural gas (LNG), petrol or any combination of these fuels, is it fitted with an automatic inertia fuel cut off device?	Yes	No	N/A
10d	Does it also have a manually operated fuel cut off device externally mounted which is easily visible and readily accessible at all times from the outside of the vehicle with its location and means of operation clearly marked?	Yes	No	N/A

Exhaust emissions standards				
11	Does the vehicle comply with the Manchester City Council age/emission policy?  <a href="http://www.manchester.gov.uk/downloads/download/4346/emissions_and_age_policy-phhc">http://www.manchester.gov.uk/downloads/download/4346/emissions_and_age_policy-phhc</a>	Yes	No	
11a	Does Vehicle meet the current or immediate previous euro emission standard?	Yes	No	

Body				
12a	Is the vehicle body of the fixed head type with a partially glazed partition separating the passenger from the driver?	Yes	No	
12b	Does the overall length exceed 5 metres?  This is essential for determining the size of taxi ranks	Yes	No	

Facilities for the Disabled				
13a	Is the vehicle capable of carrying a wheelchair passenger?	Yes	No	

13b (i)	Does the vehicle have anchorages provided for wheelchair tie downs and the wheelchair passenger restraint?	Yes	No	
(ii)	Are the anchorages either chassis or floor linked and capable of withstanding approved dynamic or static tests?	Yes	No	
(iii)	Are the anchorage restraints for wheelchair and occupant independent of each other?	Yes	No	
(iv)	Are anchorages provided for the safe stowage of a wheelchair when not in use, whether folded or otherwise, if carried within the passenger compartment?	Yes	No	
(v)	Are all anchorages and restraints designed that they do not cause any danger to other passengers?	Yes	No	
13c	Is the door and doorway constructed to permit an unrestricted opening across the doorway of at least 75cm? The minimum angle of a hinged door when opened must be 90 degrees.	Yes	No	
13d	Is there a clear height of the doorway of not less than 1.2 metres?	Yes	No	
13e	Does the vehicle have grab handles placed at door entrances to assist the elderly and disabled?	Yes	No	
13e	Are the grab handles in a contrasting colour?	Yes	No	
13f (1)	Where the top of the tread for any entrance is at floor level of the passenger compartment, does it comply with the following requirements:			
(i).	Is not more than 380 mm from the ground, (measured at the centre of the tread width)	Yes	No	
(ii)	The surface is covered in a slip-resistant material	Yes	No	
(iii)	Has a band of colour across the entire width of the edge which shall contrast with the remainder of the tread and floor covering	Yes	No	
(2)	Where any entrance be more than 380 mm from the ground, is there an external interim step available when the associated passenger door is opened and comply with the following requirements: <b>Step has been fitted.</b>			
(i)	Is not more than 380 mm in height from the ground, (measured at the centre of the step width)	Yes	No	



(ii)	Is not less than 250mm deep	Yes	No	
(iii)	The surface is covered in a slip-resistant material	Yes	No	
(iv)	Has a band of colour across its leading edge which shall contrast with the remainder of the step and floor covering	Yes	No	
(v)	Is not capable of operation whilst the vehicle is in motion	Yes	No	
(vi)	If automatic or powered, is it fitted with a safety device which stops the motion of the step if the step is subject to a reactive force not exceeding 150N in any direction and if that motion could cause injury to the passenger?	Yes	No	
(vii)	Can it fold or retract so that it does not project beyond the side face of the vehicle and the vehicle is not capable of being driven away unless the step is so folded or retracted?	Yes	No	
13g	Is the vertical distance between the highest part of the floor and the roof in the passenger compartment less than 1.3 metres?	Yes	No	
13h	Where seats are placed facing each other, is there a minimum space of 42.5cm between any part of the front of a seat and any part of any other seat which faces it?	Yes	No	
13i	Where all seats are placed facing to the front of the vehicle, is there a clear space of at least 66cm in front of every part of each seat squab, measured along a horizontal plane at the centre of the cushion?	Yes	No	
13j	Is there a ramp for the loading of a wheelchair and occupant available at all times for use, as a minimum, at the nearside passenger door?	Yes	No	
13j (i)	Does the ramp have a safety lip, be 70cm wide, as a minimum, and comprise a single non-slip surface? *It is desirable for this facility to be available at the offside passenger door also.	Yes	No	
13j (ii)	Does the ramp have an adequate locking device fitted to ensure that the ramp does not slip or tilt when in use?	Yes	No	
13j (iii)	Is there provision for the ramp to be stowed safely when not in use?	Yes	No	
13k	Is the vehicle fitted with a swivel seat for use by a passenger accessing.	Yes	No	

Passenger Compartment				
14a	When fitted, are the occasional seats at least 40cm in width and is the distance from the back of the upholstery to the front edge of the seat not less than 35.5cm?	Yes	No	
14b	Are occasional seats arranged as to rise automatically when not in use and placed at least 4cm apart when not in use and do not obstruct doorways?	Yes	No	
14c	Are there suitable means provided to assist persons to rise from the rear seat with particular attention to the needs of the elderly and disabled?	Yes	No	
14d	Are the rear seat dimensions adequate to carry the appropriate number of adult passengers comfortably?	Yes	No	
14e	Is the vehicle fitted with lap and diagonal seatbelts on all seats (including rear facing seats)?	Yes	No	
14f	Are colour contrasting sight patches provided on all passenger seats?	Yes	No	
14g	Are head restraints fitted for all (forward and rear facing) seats?	Yes	No	
14g (i)	Do the design of headrests maximise rear sightlines for the driver when any of the passenger seats are not occupied?	Yes	No	
14h	Is an induction loop system (or equivalent) fitted?	Yes	No	

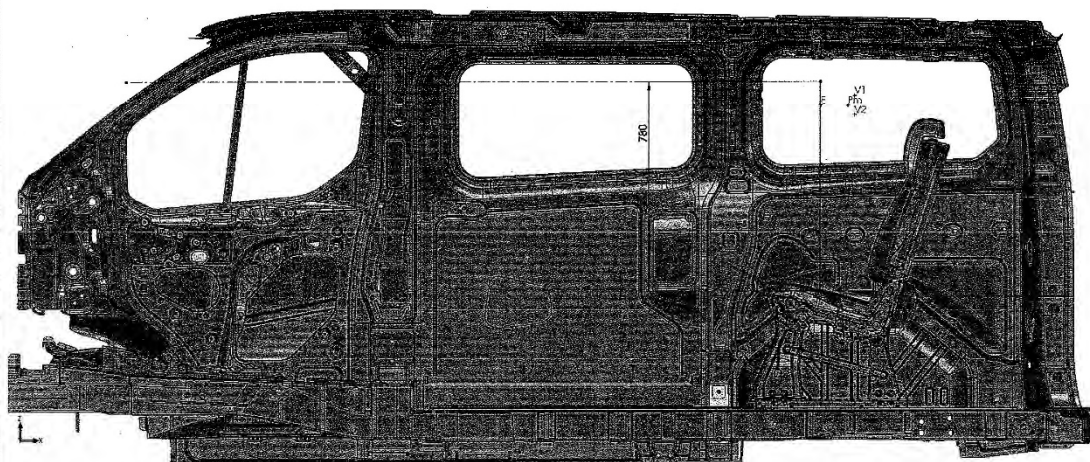
Driver's Compartment				
15a	Is the driver's compartment designed so that the driver has adequate room, can easily reach, and quickly operate, the controls?	Yes	No	
15b	Are the controls placed as to allow reasonable access to the driver's seat and, when centrally placed, are they properly protected from contact with luggage?	Yes	No	
15c	Is the vehicle provided with an approved means of communication between the passenger and the driver	Yes	No	

15c (i)	If the vehicle is fitted with a sliding window on the glazed partition, is the maximum width of the opening more than 11.5cm.	Yes	No	
15c	If the vehicle is fitted with a single-piece glazed partition is there a facility provided for making payment to the driver.	Yes	No	
15d	Does the design of a headrest maximise the rear sightlines for the driver, when any passenger's seats are not occupied?	Yes	No	

Driver Visibility				
16	Is the vehicle fitted with a single piece full width rear window	Yes	No	

Passenger Visibility				
17	Do the windows maximise passenger visibility in and out of the vehicle?	Yes	No	
17a	Is the top of the window line for front and side windows, when measured vertically to the top of the visible portion of the glass, 780mm or more on any glass panel forward of or beside the seated passenger?	Yes	No	

*Please note; the vertical distance is to be measured through the E point as defined in Directive 77/649/EEC, from the top of the uncompressed rear forward-facing passenger seat cushion to the first point of totally obscured glass.*



**Manufacturers are requested to declare conformity to this condition in drawing format.**

17a (i)	Is the bottom of the window area in the passenger compartment available for opening by the seated person	Yes	No	
b (i)	Do the windows permit maximum visibility into and out of, the vehicle	Yes	No	
(ii)	Is the light transmission through the front window less than 75%	Yes	No	
(iii)	Is the side door glass less than 70%	Yes	No	
(iv)	Is the remaining glass (except rear window) less than 70%	Yes	No	

Heating and Ventilation				
18	Does the vehicle have an adequate heating and ventilation system provided for the driver and passengers?	Yes	No	
18 (i)	Is there an independent control by the driver and for the passengers?	Yes	No	
18 (ii)	Are all switches within easy reach of seated passengers, including those in wheelchairs?	Yes	No	
Door Fittings				
19	Does the vehicle have an approved type of automatic door securing device which is fitted to passenger doors to prevent them being opened when the vehicle is in motion?	Yes	No	
19 (i)	When the vehicle is stationary, are the passenger doors capable of being readily opened from the inside and outside of the vehicle by one operation of the latch mechanism?	Yes	No	
19 (ii)	When the driver has the foot brake depressed, can the passenger open the door from the inside?	Yes	No	
19 (iii)	Is the interior door handle clearly identified to prevent it being mistaken for any other control?	Yes	No	

Fare table and number plate				
20	Does the vehicle have a frame provided for the fare table fixed in an appropriate place.	Yes	No	
20 (i)	Does the vehicle have a position for an interior number plate provided with the words 'the number of this taxi is .... Shown immediately above the position of the plate?	Yes	No	

Floor Covering				
21	Is the flooring of the passenger compartment covered with a slip resistant material, which can be easily cleaned?	Yes	No	
21 (i)	Does the floor covering impede the movement of wheelchairs?	Yes	No	
21 (ii)	Does the colour of the floor covering contrast with any up stand areas around it and with the colour of the seats?	Yes	No	

Luggage				
22	Is there a suitable and dedicated provision for the secure carriage of luggage?	Yes	No	
22 (i)	Is the luggage space a separated compartment, which is proportionate in size to the number of passengers carried?	Yes	No	

"Taxi" sign				
23	Will the vehicle accommodate the fitting of a "Taxi" sign, approved by the Council which can be clearly visible both by day and night when the taxi is available for hire?	Yes	No	

Radio Apparatus				
24	Is the vehicle suitable for the fitting of radio equipment?	Yes	No	

**If the vehicle does not comply to the standard or you have answered 'no' to the questions above, please provide a full explanation in the space below and state the number it relates to. Please use additional sheet(s) as required**

Question Number	How does your vehicle not comply with the standard and why?
13b (iv)	Anchorage are not provided for the storage of a wheelchair when not in use.
13f (1) (iii)	Band of florescent yellow can be added on edge of step specifically for Manchester.
13f (2) (iv)	Band of florescent yellow can be added on edge of step specifically for Manchester.
15c (i)	Does not have a sliding window. Part of partition is cut out – measuring 10cm; enough space for payment to be made.

## APPENDIX 1 B **TORD**



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T 02476 57 2031

Ms. Ann Marku  
Principal Licensing Officer (Taxis)  
Planning, Building Control and Licensing  
Growth and Neighborhoods Directorate  
Manchester City Council  
Albert Square  
PO Box 532  
M60 2LA

10 October 2017

Dear Ann,

### **Importance of retaining the swivel seat requirement for hackney carriage licenses**

I am writing to you in anticipation of your report on taxi licence regulations and to highlight the importance of retaining the swivel seat requirement for hackney carriage licenses issued by Manchester City Council.

As the manufacturer of the iconic purpose-built London taxi, LEVC (formerly LTC) is proud of the fact that our taxis are fully wheelchair accessible and feature a range of accessibility aids to ensure passengers of all abilities can be confident in making their planned journey, safely and in comfort.

One of the taxi's core accessibility features is the swivel seat. Restricted mobility often impacts the ability to twist in position, making turning around to sit within a vehicle difficult. The mandatory requirement for a swivel seat to be installed in all hackney carriage vehicles ensures easy entry and exit for less mobile passengers. When used in conjunction with the integrated and retractable wheelchair ramp, passengers with severe mobility challenges are able to enter the vehicle without unnecessary hassle for them or for the driver.

Many passengers travel by taxi because of the accessibility benefits they provide and less mobile passengers tell us that an accessible taxi gives them more independence and that accessibility is often not fully appreciated until it is needed. This is supported by disability groups and research by Whizz-Kidz found that more than three quarters of wheelchair users, their carers and families are confident taxis will accommodate their needs.

continued.....

LEVC is a trading name of London EV Company Limited (Registration No. 08357576).  
Registered address is Li Close, Ansty Park, Coventry, CV7 9RF, England.



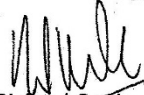
- 2 -

LEVC understands that the swivel seat, along with some of the other accessibility aids, is not used on a regular basis. However, the key benefit of a purpose-built accessible taxi fleet is that it offers passengers a consistent level of accessibility and ensures that every taxi is able to transport passengers with a variety of needs without special arrangements.

LEVC believes that taxis, and the accessibility they afford less mobile passengers, are an integral part of an inclusive public transport system. We would have serious concerns over any decision to remove the mandatory swivel seat requirement because it would disproportionately affect less mobile passengers who rely on taxis to get them from A to B. We would also caution against any move to allow drivers to decide the accessibility aids installed in their vehicle as this could lead to the removal of any features that add a cost, but are for the benefit of passengers and drivers.

I understand that the council's Licensing and Appeals Committee is due to meet in the coming weeks and would welcome the opportunity for one of our product specialists to attend the meeting to discuss the benefits of the swivel seat in further detail. In the meantime, please do get in touch if we can provide any further information.

Yours sincerely,



Richard Gordon  
Commercial Director, LEVC