

APPENDIX 4 (a)



Delta Central
C/O Abingdon Business Centre,
346 Osmaston Road,
Derby
DE24 8AG
Tel/Fax 01332 203838

28th June 2004

Derby City Council,
Environmental Health & Safety Standards,
Celtic House,
Heritage Gate,
Friary Street,
Derby DE1 2QX

Your Reference: ENFPROTOCOLET/DND/JBF

Attn: David Dowbenko
Principle Licensing Officer

Dear Mr. Dowbenko

Reference: Revised Draft of Protocol

Thank you for the revised draft protocol which we received last week and on which we would make the following comment. In the round it looks fair and reasonable with only one area which we believe needs looking at again and the inclusion of one area which we believe has been overlooked.

The paragraph we are referring to is section 1.3 in Appendix A: Parking in a "Prominent Position". As you are probably aware most Private Hire Companies have more licensed vehicles on the road than they have parking places at their premises. Although this is not the case as far as we are concerned we do always try to ensure that our vehicles do not make wasted journeys. The reasons for this being:

- 1) That we do not waste fuel.
- 2) That we make every effort to reduce emission gases and pollution when possible.
- 3) That we reduce the wear & tare of the vehicles.
- 4) That we minimize the amount of time our drivers spend driving.
- 5) To limit the time customers have to wait.

All points we hope the council would support.

To achieve this, we and other operators often request the driver to pull over and wait for the next job; in some cases we have made arrangements where we can park 2 or 3 vehicles at a location away from base. In these cases, they may be judged to be in a "Prominent Position", how is this to be established, what exactly is a "Prominent Position". In my view this could literally mean any place on the public highway, it is therefore imperative, in order to ensure that everyone, operators, drivers and inspectors use the same criteria, to do this the council must clearly define exactly what it means by a

"Prominent Position" or perhaps even remove this particular clause to save any misunderstandings and costly litigation.

The area we believe has been overlooked is that of Bus Lanes, we believe that a plated and clearly signed private hire vehicle should be authorised to use the bus lanes in the same way as licensed Hackney Cabs are, our reasons for stating this are:

- a) Our vehicles are public service vehicles.
- b) We are required to be licensed just like Hackney cabs.
- c) We pay a license fee to the authorities, just like Hackney cabs.
- d) Our vehicles are subject to the same tests and regulations as Hackney cabs.
- e) Our customers are entitled to the same rights under European Legislation and should not be discriminated against. To allow a Hackney cab in the bus lane and not a private hire vehicle is discriminatory.
- f) Why should a citizen who calls a private hire vehicle as apposed to hailing a Hackney cab be treated as 2nd Class?

We like you, support the efforts you are making to ensure that the standards of service offered by both the Hackney and Private Company's are raised, whilst at the same time ensuring that we help to improve our environment by ensuring the efficient use of our vehicles.

Yours sincerely,



M. P. Doyle
For
Delta Central Cars