

Licensing Section,  
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Re Taxi Licencing Conditions – Consultation.

6<sup>th</sup> June 2011

I am fairly new to the Epping Forest Taxi trade having held a licence for coming up to four months now, the only change i can spot is that drivers are no longer required to wear their badge just to display it in the car which makes sense, one wonders though if it will be enforced as in the four months I have worked I have yet to see a driver wearing a badge.

And also that doors must be kept unlocked when the vehicle is moving, which doesn't affect me but will drive all of the stae of the art purpose built modern taxis off the road, and London Black Cabs.

All the rest of what is in place and being suggested makes perfect sense to me other than Rule 27 in the drivers conditions, which I feel needs further explanation, I have yet to meet anyone who understands what it means in practical terms and I am told that it has never been enforced anyway.

Taken literally it means that a driver can only park his car on his own private driveway, and for the rest of the time he has to sit in it. Surely I am allowed, as I do to park my vehichle in a regualted spot on a public road in Waltham Forest carrying a Residents Parking Permit within the parking regulations, otherwise anyone living in a home without there own driveway would be excluded fom the trade.

Equally taken literally I am not allowed to stop for coffee or a break or to stretch my legs or even to park on Sainsburys Car Park whilst I shop, surely thats not the intention either, on Health and Safety grounds any risk assessment would demand the opposite insisting that drivers do get out of their cars and take a break and have a coffee and a walk around , anything else would be detrimental to the safety of drivers and passengers alike.

And finally if the vehicle is parked in any way illegally then the police have the right to tow it away anyway which makes it difficult to see what the rule is trying to achieve.

One assumes that it is maybe to prevent illegal Ranking such as that taking place at Buckhurst Hill Underground Station, though again even there no one seems interested in applying the rules as they stand and it wouldn't be in the public interest to do so anyway as it would leave the residents of Buckhurst Hill and surr-ounds with no integrated public transport service to get them home which is again not what anyone would want or expect.

Interestingly this morning I did see sign that maybe some enforcement action is imminent and I still don't know where I stand hence the purpose of this note, I dropped off a pre booked passenger at the station early this morning and then jumped out grabbed a copy of the Metro from the station and a Kit Kat from the Newsagents ,got back in my car and drove off, our office (Sadlers) to my knowledge is the only office or independent driver that accepts and obeys the no ranking up rule, everyone else does so with impunity. It took me less than sixty seconds, but on my return one of the station staff was taking a photograph of my licence plate presumably with a possible view of taking action against me for either ranking up, leaving my car or both.

Surely the rules don't prevent me from getting a free paper and a Kit Kat or a drink and driving off, as this would ultimately endanger my passengers and it would seem exceptionally harsh when others are ranking up there all day long causing a huge hazard for the buses and emergency services.

One wonders why you don't simply either provide a rank in Victoria Rd or get TfL to re open the other exit to the station so we could pick them up, opposite the Railway Tavern, not so expensive now it would no longer need staffing with Oyster barriers. Its clearly something that does need urgently dealing with and a solution found that provides the public with a car service that does not endanger everyones Health and Safety and allows the drivers to earn a reasonable living.

That aside surely it would be a good idea to rewrite Rule 27 in order to be much more specific about what it really means.

As well as presenting this to the licensing committee, I would appreciate if someone would write and clarify exactly what I and other drivers can or can't do with Rule 27 as it stands.

Yours faithfully



David Betteridge.