

WORCESTERSHIRE REGULATORY
SERVICES

30 JUL 2015

Head of Licensing
Worcestershire Regulatory Services
Wyre Forest House
Finepoint Way
Kidderminster
DY11 7WF

28th July 2015

Dear Sir/Madam

Re: Private/Public Hire Vehicle – spare wheel requirement

I am currently an independent licensed taxi driver in Bromsgrove, however I will shortly be applying for an Operators License to enable me to offer a Private Hire Executive Service with a Mercedes E Class I have just ordered.

This is a standard, brand new Mercedes E Class the car most used and suited to the Executive/Chauffeur type of work. However I have been advised by licensing that my vehicle will not be deemed suitable as it does not have "a spare wheel and enough tools to enable a wheel to be changed".

Not only does it not have a spare wheel but it doesn't have the space to put one, due to the BlueTEC system which reduces emissions and is situated where a spare wheel would have been in older models. The government are keen to reduce vehicle pollution and one way manufactures do this is to reduce vehicle weight, to reduce fuel consumption and therefore reduce harmful emissions. So to buy a spare wheel, jack and brace to put in the boots luggage space seems totally against what everyone else is trying to achieve.

In addition to increasing pollution how would this help the family that want to go on holiday whose luggage I couldn't fit in the boot, or the disabled passenger who I have to refuse because I couldn't fit his wheelchair in the boot?

My car will have the tools to deal with a puncture as required by the law and this should be sufficient for a licensed vehicle. Yes, these tools won't deal with a catastrophic tyre/wheel failure but blow outs very rarely happen to cars and often involve accident damage, while hitting a big pothole in the road would also be likely to cause damage to the vehicle suspension. Neither of these situations would be solved by carrying a spare wheel.

A vehicle is much more likely to have a windscreen break or a mechanical breakdown but licensing do not require drivers to have windscreen replacement cover or breakdown cover. If a driver has a problem with their vehicle that can't be sorted immediately, then they would contact another driver to arrange for any passengers in the car at the time to be collected and taken to their destination. Even if a driver has a puncture they wouldn't keep passenger's waiting while they fix it whether they had a spare tyre or not.

I have spoken to a number of other drivers who support my view that this requirement needs to be removed to allow for the way new cars are being manufactured. Whether I had purchased a brand new Mercedes C or E Class, BMW 5 or 7 Series or Audi A6 none would be allowed to be used for carriage of passengers by Bromsgrove Licensing as none of them have a spare wheel.

I am also aware that many licenses have been issued to cars without spare wheels over the last few years (including this year) and that some haven't which seems unfair. What also seems unfair is that there must be thousands of Mercedes, BMW's, Audi's etc. that are being used for private/public hire throughout the country in other licensing areas that are not carrying a spare wheel and taking up luggage space.

One last point: more cars now come without a spare wheel than do, so this situation is going to become more and more of a problem if you want drivers to have newer vehicles.

I would be grateful if you would look into this outdated requirement as a matter of urgency as I take delivery of my car on 1st September 2015 and will require it plating on or around that date.

Thank you.

Yours sincerely,