

**APPLICATION FOR APPROVAL BY SIX  
MANUFACTURERS / INSTALLERS OF WHEELCHAIR  
ACCESS FACILITIES FOR HACKNEY CARRIAGE AND  
PRIVATE HIRE VEHICLE**

**REPORT BY:  
Head of Environmental Health and Trading Standards**

### **Purpose**

1. To consider approving six independent and separate companies as '*approved manufacturers of wheelchair access vehicles to be used as licensed vehicles in Herefordshire*'. The six companies who have applied are:
  - i. Allied Vehicles Ltd, Glasgow
  - ii. GM Coachwork Ltd, Newton Abbot, Devon
  - iii. LDV Group Ltd, Birmingham
  - iv. Oughtred & Harrison (Facilities) Ltd, Goole, Humberside
  - v. Ponting & Betty Ltd, Northampton
  - vi. Stanford Coachworks Ltd, Essex

### **Background**

2. On 15 May 2008 the Regulatory Committee met to update the conditions for licensed vehicles in respect to the required test to ensure that converted vehicles that had wheelchair access facilities were safe and fit for use. However, on this occasion a decision could not be agreed for the final wording of a revised condition.
3. On 15 July 2008 the Regulatory Committee therefore reconsidered the matter. The Committee agreed that the Council would normally approve wheelchair access vehicles for hackney or private hire *only* if they met the following criteria:-
  - i. The manufacturer must have a vehicle prototype that has passed the 'VOSA –SVA Single Vehicle Approval Standard Test', including class D (disabled) and class P (for import)
  - or
  - ii. The manufacturer must prove to the Council that its vehicle has relevant safety standards and is able to demonstrate consistent manufacture to that standard
4. After this decision was made, the licensing section wrote to all known installers / manufacturers of wheelchair facilities of Herefordshire's taxi fleet in August 2008 and

invited them to apply for consideration by the Regulatory Committee as approved manufacturers as per item 3 (ii) above. (See Appendix 1 for copy of letter).

5. The licensing team simultaneously sent letters to Herefordshire's taxi trade advising them of the committee decision on 15<sup>th</sup> July, whilst also asking them to notify the Council of any manufacturers that may have been missed off the list, so that they could be consulted too. (See Appendix 2 for copy of letter).
6. As a result of this exercise, the above mentioned six companies have applied to Herefordshire Council under 3(ii) above, i.e. they wish their vehicles to be approved by the Council's Regulatory Committee because they feel that they have *relevant safety standards and are able to demonstrate consistent manufacture to that standard*.

### **Manufacturers' Tests and Quality Procedures**

7. The six companies were asked to produce evidence for their wheelchair access vehicle in the following categories:
  - i. Details of any test certificates that would help demonstrate that their vehicle meets the industry standard for the installation of wheelchair access facilities (e.g. a 'Status' test or a 'Mira' test). If unavailable, they were asked to provide a VOSA Single Vehicle Approval Standard Test, for class D (disabled) and P (import).
  - ii. Quality assurance certification.
  - iii. Documentation to demonstrate that there are procedures in place to ensure consistent installation of the wheelchair facility in accordance with the prototype which complies with the test certificates mentioned in (i) above.
  - iv. The list of vehicles seeking approval and their approval certificate numbers from the VCA.
8. The documentation supplied by the six companies in answer to the above list is given in Appendix 3. For ease of reference, Table 1 below also summarises the information provided against the criteria requested:

Table 1: Summary of Information Provided to Herefordshire Council

	Test Certificates submitted	Quality Assurance docs / info received	Documents / procedures submitted to show consistency	List of vehicles for approval and VCA Type Approval docs submitted
<b>Allied</b>	<p>'Status' Wheelchair Accessible Vehicle Test report for <u>Fiat Doblo (high roof version)</u> - Wheelchair restraints complied with motability standard on 1.6.2005</p> <p>'Status' Wheelchair Accessible Vehicle Test Report for <u>Peugeot Expert G9 LWB &amp; SWB</u> versions – Wheelchair restraints complied with EU Directive on 19.12.2006</p> <p>'Status' Seat Belt Anchorage Test Report for <u>Peugeot Expert Taxi</u> – In June 2005 the vehicle seats complied with EU Directive for strength and position and the wheelchair restraints complied with Motability standards.</p>	<p>ISO 9001:2000 covering customisation and conversion of donor vehicles</p> <p>First registered 6.3.1997</p> <p>Last issued 4.6.2008</p> <p>Expires 18.8.2009</p>	<p>Examples of E7 and Fiat Freedom quality control checklists received</p>	<p>Current E7 Taxi EC Type approval No. ell*2001*116*0315*00</p> <p>Fax from VCA to show that above type approval ell*2001*116*0315 to be extended to cover the Eurobus and Eurobus SE.</p> <p>Previous E7 Taxi EC Type approval No. ell*2001*116*0232*01</p> <p>Fiat Freedom (Doblo) Taxi EC Type approval No. LC/369/A/072</p>
<b>GM Coachworks</b>	<p>5 x seemingly identical VCA certificates dated November 2004 certifying compliance to the 'Seat Belt Anchorage on M2 Vehicles' for the GM floor system for Mercedes Sprinter &amp; VW Long wheelbase vehicles.</p> <p>5 x self published leaflets on various models manufactured by GM</p>	<p>ISO 9001:2000 covering production and sales of vehicles / conversions and servicing passenger lifts</p> <p>First issued 3.12.2005</p> <p>Expires 3.12.2008</p>	<p>None submitted</p>	<p>GM Aspen (based on Fiat Doblo) EC Type approval No. LC/379/A/082V</p> <p>GM Dakota &amp; Arizona (based on Fiat Scudi Combi) EC Type approval No. LC/353/A/054</p> <p>GM Montana (based on Peugeot, Citroen &amp; Fiat models) EC Type approval No. LC/447/A/150V</p>
<b>LDV Group</b>	<p>No test certificates submitted, only the PSVC minibus type approval documentation</p>	<p>ISO 9001:2000 covering the design and manufacture of commercial vehicles</p> <p>First registered 16.6.1992</p> <p>Last issued 1.10.2006</p> <p>Expires 30.9.2009</p>	<p>29 x QA Production control sheets submitted</p>	<p>Minibus type approvals authenticated by PSVC (No. 'PSV 0199') for two vehicles relevant for hackney or private hire, i.e.</p> <p>LDV Maxus minibus for (d) 4 passengers seats + 4 wheelchairs with internal lift (e) 4 passengers seats + 4 wheelchairs with external lift</p>

<b>Oughtred &amp; Harrison</b>	4 x 'Status' Wheelchair & Occupant Securement Anchorage Tests on Fiat Doblo shell, Fiat Scudo shell, Renault Trafic & Renault Master – all complied with between 2004 & 2005.  Status' Wheelchair Ramp/Tail Lift Test on Renault Kangoo – complied Feb 2006.	ISO 9001:2000 covering vehicle bodybuilding and conversions and mechanical/electrical activities  First registered 13.5.2005  Last issued 30.5.2008  Expires 20.8.2011	None submitted	Fiat Doblo shell, Fiat Scudo shell, Renault Trafic & Renault Master  No type approval certificates submitted
<b>Ponting &amp; Betty</b>	An extract from an undated 'Status' test was submitted for their VW 'T5' taxi conversion only.  No independent verification of compliance.	No externally accredited QA system in place.  Application states intention to apply for ISO 9001:2000	No QA documentation submitted	VW Unique Cab EC Type approval No. LC/382/A/085V  VW Town Cab EC Type approval No. LC/383/A/086V  VW Caravelle Cab EC Type approval No. LC/383/A/086V  VW City 7 EC Type approval No. LC/382/A/085V  Mercedes Town Cab EC Type approval No. LC/360/A/062V  Mercedes BM8 EC Type approval No. LC/360/A/062V  Ford Unique Cab EC Type approval No. LC/359/A/061V
<b>Stanford Coachworks</b>	Only 1 x self certification of a lift test supplied	Stanford literature implies manufacture to ISO 9000:2000, but no QA certification submitted	No supporting documentation submitted	Stanford seem to convert a number of models although the application (via City Taxis and not from Stanford itself), seems to relate to a VW 'LT' conversion reg. GX05 KHO (plate H380) only.

## Options

- A) To approve all six manufacturers.
- B) To approve all six manufacturers, but on the basis of receiving written verification from each manufacturer as to the actual vehicle to be licensed in Herefordshire (i.e. request a list of the registration numbers of each vehicle with an undertaking that each has been found to be compliant with the appropriate submitted tests and certification).
- C) Approve specified manufacturers only (with or without the above mentioned caveat in B above) and require further information from those not approved, should they wish to be reconsidered.
- D) To approve none of the six who have applied and require further information should they wish to be reconsidered.
- E) To come to some other conclusion.

Appendix 1 - copy of letter to manufacturers

Appendix 2 - copy of letter to taxi trade

Appendix 3 – bundle of documentation received from all 6 manufacturers