

Consultation Responses – Vehicle retest fee

Question asked:

Vehicle re-test fee

It has become apparent that a high percentage of vehicles are being presented for test in an unsuitable condition. This means that there are a significant number of re-tests being conducted without further charge. In some instances, vehicles have been in such poor condition that several hours are spent by the testing stations dealing with these vehicles. The Licensing Authority therefore seeks views on the following:

1. A re-test fee of £45.00 payable directly to the testing station
2. If the re-test takes longer than 60 minutes a full test fee of £78.00 will be charged, payable directly to the testing station
3. If a vehicle is presented for re-test more than 14 days after the initial test, the full fee of £78.00 will be payable directly to the testing station on further testing.

It is hoped that this change will result in vehicle licence holders ensuring that their vehicles are in a suitable condition at all times. The Council is conscious that some vehicles may be being used in an unsafe or unsuitable condition and will also be taking steps to suspend vehicles licences in this instance. I must also clarify, as it appears that there are some licence holders who are not aware, that all vehicles that fail a test must pass a subsequent test.

Before a change to the fees can be made the Licensing Authority, in addition to this consultation, will be required to publish a Notice in at least one local paper. This Notice would give a further right of objection to the changes.

Consultation will be conducted for the period 18th March 2013 – 10th June 2013.

Responses provided:

1. I have received your letter concerning the proposed changes. I have no comment on them.
2. Hackney Carriage and Private Hire Licensing Consultation – Thank you for your letter detailing Amendments numbered 4921 – 4926. I am in full agreement with them all.
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8. Hackney Carriage and Private Hire Licensing Consultation – Thank you for your letter detailing Amendments numbered 4921 – 4926. I am in full agreement with them all.
9. I do not believe a retest fee should be charged if a vehicle turns up in a poor state it should be refused to be tested by the testing station in the first place.

I feel that if a retest fee was introduced it would encourage testing stations to fail vehicles so they would get an extra income so I believe it should not be charged and as with a normal MOT you have a 7 day period to get repairs sorted.

I always ensure my vehicle turns up serviced and clean ready for a test (I always ensure my vehicle is clean and tidy and smelling nice for my clients)

10. I object to retest fees for vehicles that fail Taxi/private hire test, it would seem to me that any garage would be encouraged to fail vehicles because there would be a cash incentive, although I have had a few failures the retest has never been more than 5 mins as they only retest the items that have failed, if you take any car for an MOT there is no retest fee as long as you do the retest within 14 days.
11. I would like to comment on the proposal to introduce a re-test fee for Private Hire Vehicles. At the moment the council test for a Private Hire Vehicle is a lot more stringent than a standard MOT test, therefore when we have a mechanic perform a pre MOT test to prepare our Vehicle for the Council test he can only perform to the transport guidelines, so sometimes the Council tester will not pass something which by Ministry of Transport standards will pass. How we can judge that is almost impossible without the Council offering its own Pre-MOT Test. I am against a test which overrules the Ministry of Transport's set guidelines but can understand the need for safe Vehicles, maybe a new test should be offered when a vehicle exceeds maybe a set mileage instead of the yearly Test.
12. I am very surprised you are suggesting a fee to re-testing a vehicle. The annual fee has increased from £200 to £301 in the few years you have been in control at a time when all businesses have been struggling to make ends meet. A further charge is not justifiable when you consider the following:

I am forced to use Poole Street MOT centre because my vehicle was originally licensed by Macclesfield Borough Council.

I have been a taxi driver for 14 years. I have always looked after my vehicles to a high standard. For the first 6 years my taxi passed the test with no need for a retest. The Poole Street test centre from this time has failed my vehicles on very minor points which could have been covered by a recommendation. I now wait to see what needs replacing and this is why the retest has increased in number. Even if you replace parts it is easy to fail a vehicle.

I have used various Garages over the years and all have been frustrated when they are asked to replace parts, by your inspectors, which are not worn out and are safe.

When I take the vehicle for its retest they rarely check the repairs and very rarely put the vehicle in the garage, never mind on a ramp. The proposed charge is out of proportion to the amount of work they undertake on the retest.

I am surprised the Macclesfield Borough requirements of one retest was not taken up when the new Borough was created.

I suggest:

1. The annual fee included one retest which is paid by you and if a further test is required a full test fee is charged. Or
2. We removed the independent test and use the standard MOT certificate.

The second option would allow us to keep working when changing vehicles. The 10 day waiting time is unrealistic when you are trying to provide a good service to our customers.

You also need to ensure that the vehicles are passed if the parts work at the time of the test. Fail should only mean not road worthy.

If I am forced to pay a retest and the parts removed are working I would expect the council to cover all my repairs and loss of earnings.

13. In your item 5987 you say you propose to charge a retest fee. Are we not already paying far over the odds at present when a MOT costs on average £45.00 with no retest fee within 7 days and this is all the pass off is with a small admin to make up plates can you please give a breakdown of your current charges and explain how you come up with these unplausable figures surely if you cant see this as anything other than a rip off way to subsidise failings it is time to outsource to other VOSA approved centres and stop driving us into the ground?
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16. Vehicle re-test fee

With respect to the above I firmly disagree with the proposal for the following reasons:-

By implementing a retest fee (or fine) for failed vehicles is a conflict of interest on the Council's behalf. If this proposal was accepted then it could be seen that vehicles could be failed intentionally as a way of increasing revenue for the Council. At present the rules allow for up to five separate failures before a full re-test is required along with the subsequent fee. If this proposal was to be approved then it would be possible for the Council to charge additional fees for failures arising from unpreventable faults such as:-

- a number plate bulb failure which could happen on or before the test. The £1.50 bulb replacement would then incur an additional retest fee of the £45.00.
- current testing of the "metered mile" does not account for traffic conditions. All meters when tested over the mile distance should be placed on "STOP" which is not currently the case. At present when testing meters in heavy traffic waiting time is applied to the metered test when the vehicle goes below 12mph which causes the metered mile to change ahead of the mile marker the Testing Station uses. The meter recalibration which is not necessary in these cases would cost the owner £25.00 plus the additional retest fee of £45.00.
- A split or cracked wheel bush on a vehicle is left to the discretion of the Testing Station as to whether it is deemed a failure or an advisory note. I believe all such advisories would become failures more often if the Testing Station knew they would receive additional revenue £45.00. This is obviously a conflict in interest.

It must always be assumed that a vehicle is presented for testing in a satisfactory condition and is believed by the owner to be fit for purpose. It must be assumed that the owner is not a mechanic and cannot possibly be aware of the condition of all the elements tested by the testing station. I believe that driver/owners should not be penalised for elements tested which are not visible to the owner such as exhaust emissions, under body corrosion, milometer distance calibration etc.. If a taxi is presented with bald tyres then this is unacceptable and avoidable, however, if a taxi has a cracked windscreen or a broken hand brake cable or a blown bulb that happened on

the day of the test then I don't believe the owner should have to pay additional retest fees as these incidents are unavoidable at short notice and without cancelling the test which incurs further fees. Also if vehicles are pre-tested by MOT Stations prior to Council Tests to prevent failures then this is no guarantee that the taxi will pass 100% of the time when presented to the Council Testing Station, and if it were, then this would render the Council Test a waste of time and duplication.

I think the only solution is to keep the existing test rules and where there are more than 5 failure points results in a full re-test and the subsequent fees payable. Due to the fact that re-tests should be for 1-5 failed elements then re-tests would never take more than 60 minutes to perform. Rebooking a retest is reliant on the ability to put the failure(s) right and have an available test slot at the Testing Station within 14 days which may not be possible if the Testing Station is busy or during a Bank Holiday periods.

Therefore:-

1. is unworkable and unfair.
2. should never take more than 60 minutes if existing rules are applied.
3. should be reworded to state "a re-test should be booked with the Testing Station within 14 days after the initial test".

Please remember that for some of us with vehicles 7 years old and older, we already have the additional financial cost because of the 6 monthly tests which already place a greater burden on the Testing Stations.

17. **Vehicle Re-test Fee**

I fully agree with your proposals as some of the vehicles presented are only fit for the scrap heap.

As an exception may I quote what happened to me in 2011. I presented my vehicle having done a visual check before leaving home, my vehicle failed its test because a brake light bulb was not working, this bulb must have blown during the three mile trip between home and the test centre also the vehicles can be perfect when going to the test centre but with the amount of pot holes in the roads you only need to inadvertently hit one to cause minor damage.

As all the garages, both private and council owned quite rightly have to earn their own money they would not be much flexibility after all a further £45.00 is worth having especially when you multiply this by x amount of vehicles. This matter obviously needs more discussion and the garages involved included.