

Great Britain. London and Home Counties Traffic Advisory  
Committee: Fourth annual report for the year 1928-29  
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Great Britain. Ministry of Transport: Report on the fatal <sup>road</sup> accidents  
which occurred during the year 1933 Pp. 25-51  
Y:437.3r G7

Great Britain. Road and rail traffic act, 1933, Second  
annual reports of the licensing Authorities 1935-36  
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MINISTRY OF TRANSPORT

Fourth Annual Report of the  
London and Home Counties  
Traffic Advisory Committee  
for the Year 1928-29

*London Traffic Act, 1924*

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The following Report of the proceedings of the London and Home Counties Traffic Advisory Committee is presented to Parliament in pursuance of Section 1 (11) of the London Traffic Act, 1924. The Report covers the period from 1st October, 1928, to 30th September, 1929.

Section 8 of the Act requires omnibus proprietors operating vehicles on regular services to furnish the Minister of Transport with such returns as he may require, and an obligation is placed on him to report annually to Parliament thereon. Under these provisions certain returns have been furnished by omnibus proprietors, and statistics based on these returns, together with a table summarising the results of certain special returns of omnibus and tramcar traffic, are set out on pages 35 to 39 inclusive of this volume. A statement on page 40 shows particulars of the operation of tramway undertakings during the year ended 31st March, 1929, in the case of Local Authorities, and the 31st December, 1928, in the case of Companies. The figures in respect of the number of passengers carried during the four years 1925-26 to 1928-29, inclusive, have been summarised on page 41. A statement is also given on page 42 relating to the number of passengers originating on the London Underground Group of Railways during the years 1925-1928 inclusive.

Section 12 of the Act confers upon the Minister certain powers of enquiry in regard to street accidents occurring in the London Traffic Area. A statement respecting the action taken under this section will be found on page 43.

Ministry of Transport.

June, 1930.

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# LONDON TRAFFIC ACT, 1924.

## *London and Home Counties Traffic Advisory Committee.*

### *Fourth Annual Report—Year 1928-29.*

To HERBERT MORRISON, Esq., M.P.,  
Minister of Transport.

SIR,

We, the London and Home Counties Traffic Advisory Committee constituted under Section 1 of the London Traffic Act, 1924, have the honour to submit to you, in accordance with Section 1 (11) of the Act, the Fourth Annual Report of our proceedings. This report covers the period from the 1st October, 1928, to the 30th September, 1929.

During the year under review certain events have occurred which, in our opinion, have an important bearing on questions which have engaged our attention in the past. In this connection we desire to refer to the negotiations with regard to the new Charing Cross Bridge which have now reached the stage when the scheme can be submitted for the approval of Parliament and to the fact that the Royal Commission on Transport have presented an Interim Report dealing with the control of traffic on roads, which contains a number of important recommendations applying to the whole country, but having particular significance as regards London.

#### CONSTITUTION OF THE COMMITTEE.

The Constitution of the Committee at the commencement of the period under review was as follows:—

#### ORDINARY MEMBERS (12).

<i>Appointing Authority.</i>	<i>Name of Member.</i>
Secretary of State.	Mr. A. L. Dixon, C.B., C.B.E., Home Office.
A representative of the Metropolitan Police appointed by the Secretary of State.	Mr. F. L. D. Elliott, C.B., Assistant Commissioner, Metropolitan Police.
The London County Council.	Alderman C. W. Matthews, D.L. Mr. A. N. Scott, F.C.A.
The Corporation of the City of London.	Sir John Pakeman, C.B.E.
Metropolitan Borough Councils.	Sir Henry Jackson, M.P., M.A., M.B., J.P. Sir Henry New.
County Councils of Middlesex, Buckingham, Essex and Hertford.	Sir Edmund Barnard, O.B.E., J.P.
County Councils of Kent and Surrey.	Mr. K. E. Chalmers, J.P.
County Borough Councils of East Ham, West Ham and Croydon.	Mr. W. G. Davie, J.P.
A representative of the City Police appointed by the Corporation of the City of London.	Lt-Col. H. S. Turnbull, J.P., Commissioner of the City Police.
The Minister of Transport.	Sir Henry P. Maybury, G.B.E., K.C.M.G., C.B., M.Inst.C.E., J.P.

## ADDITIONAL MEMBERS (7).

Minister of Labour, from representatives of the interests of labour engaged in the transport industry within the London Traffic Area.	Mr. John Cliff, Transport and General Workers' Union.
	Mr. A. O'Leary, National Union of Railwaymen.
	Alderman Ben Smith, M.P., Transport and General Workers' Union.
Minister of Transport, from representatives of the interests of persons providing means of transport and users of mechanically-propelled and horse-drawn vehicles within the London Traffic Area.	Sir Herbert Walker, K.C.B., General Manager, Southern Railway Company.
	Mr. Frank Pick, Managing Director, Underground Railways and London General Omnibus Company.
	Mr. J. H. Turner, London Cartage and Haulage Contractors' Association.
	Mr. W. F. Mallender, City Motor Omnibus Company, Limited.

Sir Henry Maybury continued as Chairman of the Committee with Mr. J. S. Pool Godsell, O.B.E., M.B.E., and Mr. E. B. Hart, as Secretary and Assistant Secretary respectively.

Mr. K. E. Chalmers was unable to attend some of the meetings of the Committee owing to prolonged illness which, to our deep regret, terminated in his death on the 9th November, 1928. We recognise that, in spite of his ill-health, Mr Chalmers' interest in our work continued with unabated keenness, and we desire to place on record our sense of the zeal which he displayed in the performance of his duties as a member of the Committee.

Our term of office of three years terminated on the 1st December, 1928. The London Traffic Act, 1924, was continued in force by the provisions of the Expiring Laws Continuance Act, 1928, and the re-appointed Committee comprised the same members, with the exception of Sir Henry New and Mr. O'Leary, whose places were taken by Mr. B. J. Samels, J.P., and Mr. J. E. Binks, respectively, while the vacancy caused by the death of Mr. K. E. Chalmers was filled by the appointment of Mr. E. J. Holland, D.L., J.P.

Sir Henry Maybury was re-elected as Chairman, and Mr. Godsell and Mr. Hart were re-appointed as Secretary and Assistant Secretary, respectively.

During the year we were gratified to learn that Lt.-Col. H. S. Turnbull had been appointed a Knight of the Order of the British Empire and that the honour of Knighthood had been conferred upon Mr. E. J. Holland.

On the 10th July, 1929, Alderman Ben Smith was obliged to resign his membership of the Committee on his appointment as Treasurer to the Royal Household, and whilst we fully appreciate the honour conferred on him, we wish to record our sincere regret at the loss of a colleague who, with exceptional knowledge of London and London Traffic, has rendered most valuable assistance to the Committee.

The vacancy thus created was filled by the appointment, by the Minister of Labour, of Mr. Archie Henderson of the Transport and General Workers' Union.

At the end of the year covered by this Report we were informed that Mr. J. S. Pool Godsell was obliged to resign from his position as Secretary to the Committee on his promotion to the post of Assistant Secretary to the Roads Department of the Ministry of Transport. Mr. Godsell has been the Secretary of the Advisory Committee since its inception and has rendered us invaluable services during a period of nearly five years, and we realise that he has given us every possible assistance in connection with the innumerable problems which we have had to consider.

## MEETINGS.

During the period under review we held 16 meetings of the Main Committee, and Sub-Committees Nos. 1 and 2 held 9 and 22 meetings respectively. In addition a large number of road and traffic inspections were carried out.

## SUB-COMMITTEES.

The various standing Sub-Committees continued to perform their appointed duties as follows:—

*Sub-Committee No. 1.*—To investigate and report upon the desirability of making Regulations under Section 10 and paragraphs 2-15, 17-19, 21 and 22 of the Third Schedule to the London Traffic Act, 1924, and to report on matters arising under the above-mentioned paragraphs.

*Sub-Committee No. 2.*—To advise as to the Regulations to be made under Section 10 and paragraphs 1, 2, 3, 12, 16 and 20 of the Third Schedule to the London Traffic Act, 1924, and to report on matters arising under these paragraphs. This Sub-Committee also conducted the investigations which have formed the basis of our Reports to you on Street Accidents which are referred to hereafter and they are continuing to deal with matters germane to that subject.

*Sub-Committee on Omnibus Workings.*—To consider matters arising in connection with the restrictions imposed on omnibus services under Section 7 of the Act.

*Improvements Sub-Committee.*—To consider and advise as to the steps to be taken to secure agreement with local authorities regarding improvement works which were considered desirable in the interests of traffic conditions in the London Traffic Area.

## ARRANGEMENT OF REPORT.

In continuance of the arrangement adopted in previous Annual Reports, the various subjects with which we have been called upon to deal are grouped under the corresponding sections of the London Traffic Act, 1924, and follow the order of those sections.

(NOTE.—Section 1 deals with the constitution of the Committee.)

## SECTION 2 AND THE SECOND SCHEDULE TO THE ACT.

Under Section 2 of the Act, we are required to consider and report to you upon any matters within the scope of the provisions of the Act, and in addition to advise you upon any questions specifically referred to us by you in connection with any matters mentioned in the Second Schedule to the Act. We have accordingly reported to you on the following matters:—

*Street Accidents.*—During the year under review we furnished you with a Report\* on the general subject of street accidents in London, which forms a continuation of our earlier Report dated 10th March, 1927. We also reported† on the results of an investigation made, at the request of your predecessor, into the special subject of street accidents to children. With your approval both of these Reports have been published. We are glad to note that the grave problem of street accidents continues to receive a considerable measure of public attention and prominence in the Press. We think that no opportunity should be lost for calling attention to this matter, which continues to cause us the greatest anxiety.

Our general Report\* was for the most part an account of the action which had been taken and the further investigations which had been commenced as a result of the recommendations contained in our earlier Report of March, 1927. The result of these investigations was to convince us that the most effective way of preventing accidents is to lay before all concerned the fullest information as to how they happen. In order to obtain this information a detailed analysis is essential with regard to all accidents, as every accident is clearly a potential risk to life or limb. We considered that a closer investigation than that made heretofore should be undertaken if only for a selected

\* Second Report on Street Accidents in Greater London, July, 1929. Published by H.M. Stationery Office, price 1s. net.

† Report on Street Accidents to Children in Greater London, July, 1929. Published by H.M. Stationery Office, Price 1s. net.

area for a particular period. We therefore recommended that a committee be set up composed of officers of the Home Office and the Ministry of Transport, together with representatives of the Police to report on the extent to which this investigation should be made and the procedure which should be adopted. We understand that you have approved this step and that such a committee has been formed and is now considering these questions.

With regard to the education of the public in street safety, we expressed the opinion that extensive and sustained propaganda work is wanted and that funds should be provided to enable an intensive campaign for which the gravity of the present position calls, to be conducted by means of lectures, which should be broadcast, films, leaflets, etc., for the education and warning of all classes of road users.

Attached to the Report referred to is a map of central London extending from Islington in the north to Southwark in the south and from Regent's Park in the west to Bow in the east, showing by means of red dots the location of the fatal street accidents which occurred during the nine years from 1920 to 1928. These number 2,099 for this particular area, and the map is worthy of careful study by all concerned, showing, as it does, the neighbourhoods where more than ordinary care should be exercised both by pedestrians and drivers of vehicles. On our recommendation, you have directed that copies of this map shall be distributed to Local Authorities for exhibition at suitable places in their area.

In connection with our investigation into street fatalities to children we were furnished with more detailed information than that previously available, and, from these data, statistical tables were compiled giving the time and day of the month when the accidents occurred, as well as the age and sex of the victim, the types of vehicles concerned, and the circumstances in which the children lost their lives. The results of this examination led us to make the following recommendations:—

1. *Statistics and publicity.*—That the results of the analysis of accidents contained in the Report should be given every possible publicity. Parents and guardians should be warned in particular of the greater liability to accident of children, particularly between the ages of four and nine, and of the very real perils run by juvenile cyclists using public thoroughfares.

2. *Protection of children to and from school.*—(a) That Education Authorities when considering proposals for centralising schools should have particular regard to the character of the journeys likely to be entailed on pupils by such re-organisation.

(b) That Local Authorities should endeavour in suitable cases to make provision for grass roads (i.e., grass-lined footpaths) to enable children, as far as possible, to reach school without having to use the public highway.

3. *Provision of playgrounds.*—(a) That Local and Education Authorities should assist, so far as they are able, the work of the Evening Play Centres Committee and other similar associations in their work of organising games for children in school premises after school hours.

(b) That Local Authorities should consider the playground facilities available for children under 14, and endeavour to provide, wherever possible, playgrounds conforming to the standard of one playground to every half mile, with a space of 50 square feet for every child in its radius, and that in this connection surveys should be made with a view to ascertaining the amount of land at present unbuilt upon or occupied by property of small value which would be suitable for the purpose.

4. *Investigation of accidents.*—That the detailed investigation of all accidents recommended in the Report referred to above should include the collection of special particulars relating to accidents to children in order to ascertain to what factors peculiar to children the accidents may be primarily ascribed.

We continued our investigations into the possibility of improving conditions in various parts of London from the point of view of safety. The review of the traffic conditions in the main thoroughfares of the central area which was commenced on our suggestion, has been continued, and negotiations are in hand

with the Local Authorities for such improvements or alterations in the lay-out of streets as are considered desirable to secure greater safety. These negotiations are often of necessity protracted, but we are hopeful that in the course of time considerable benefits may accrue, with a minimum of expense, by the gradual improvement of particular localities. As stated in our last Annual Report, we realise that substantial improvements can only be effected by the carrying out of works which, in some cases, would involve almost prohibitive expenditure, but we consider that much can be done by paying close regard to minor details. We have also been able to suggest modifications, designed to obviate risk of accident, in improvement schemes which have been brought to our notice.

The procedure adopted in the siting of refuges and erection of crossing-place notices referred to in our last Annual Report has been continued, and we are grateful to the Police and Local Authorities for the co-operation they have afforded us in these matters. We consider that the attention which has been directed to these subjects cannot fail to produce beneficial results.

In our Second Report on Street Accidents referred to above, we stated that in our opinion, there was no necessity for the operation in London of a by-law to prohibit vehicles from passing tramcars when stationary for the purpose of picking up or setting down passengers, and we adhere to this view. We have not, however, reached a decision as to the steps which should be taken to reduce the number of accidents at tramcar stopping places.

The localities and streets where "roundabout" and "one-way" systems of traffic working have been put into operation on our recommendation have been kept under observation with regard to accidents to ensure that, in the event of it being found that the revised traffic working shows a tendency to expose traffic to a greater risk, suitable modifications or improvements may be devised to diminish the risk. In this connection we have under consideration the question of the most suitable method of indicating the fact that streets are "one-way" streets and the direction in which traffic is proceeding, and we are closely watching the results of experiments with distinctive signs. We also recommended an experiment with plaques bearing the words "ONE-WAY" to be attached to the lamp standards on refuges in the Haymarket, with the words "LOOK LEFT" or "LOOK RIGHT" marked on the carriageway adjacent to such refuges. This experiment, however, had not been commenced at the close of the year covered by this Report.

In view of the recommendations regarding the provision of subways in our Report of March, 1927, on the subject of Street Accidents, we are glad to note that the London County Council, as the Improvement Authority for the central area, has passed a resolution to the effect that consent under Section 18 of the London County Council (General Powers) Act, 1908, which contains provisions for rules as to the uniting of buildings, be given to the uniting of buildings of any description by subways or otherwise to underground or tube railway stations provided that—

- (1) there are adequate safeguards against fire and panic; and
- (2) the traffic conditions will be alleviated in the neighbourhood.

We understand that the new Dominion Theatre in Tottenham Court Road may be connected by subway with the adjacent tube station. We would be glad to see more schemes for the linking up of stations and buildings used by large numbers of persons, having regard to the freedom from accidents and relief of congestion which is attained.

As regards the progress made during the period under review in the provision of subways at busy pedestrian crossings, attention may be drawn to the opening of subways connected with the new underground station at Piccadilly Circus.

*Charing Cross Bridge.*—We were informed that the scheme referred to in our last Annual Report for the construction of a new road bridge at Charing Cross together with comprehensive improvements in the approaches, in place of the existing railway bridge, had been further revised as the result of negotiations between the London County Council, the Ministry of Transport, and the Southern Railway Company, and that agreement had been reached.

The revised scheme, by providing for the bridge approach road on the Westminster side to reach ground level at the Strand, where a traffic circus will be formed, disposes of the necessity for a bridge over the Strand; we are glad to note that it has been possible to modify the proposal in such a way as to render unnecessary the construction of two long viaducts previously planned for traffic along the lines of Oakley Street and Webber Street.

The amended proposal provides for the formation of a circus at the junction of Waterloo Road and the approach to the new bridge and by continuing the bridge approach on the Lambeth side at a high level facilities are given for access to the existing traffic area in front of Waterloo Station.

The net cost of the revised scheme, including the cost of re-housing, is estimated at £12,710,000, towards which a contribution of 75 per cent. has been promised from the Road Fund.

We are aware that the scheme may be subjected to criticism, but we believe that the proposals will, when carried out, prove of immense benefit to the transport facilities of the central area.

*Waterloo Bridge.*—We understand that the London County Council propose to take the necessary steps to reconstruct Waterloo Bridge, and hope that this work will be expedited in every way.

*Putney Bridge.*—We were informed that the London County Council had come to the conclusion that, from a traffic point of view, the reconstruction of Putney Bridge had prior claims over that of Wandsworth Bridge. We concurred in the Council's views, and, after examination of plans showing the extent of the improvement which would provide for a width of 74 feet between parapets, recommended that assistance towards the cost of the scheme, estimated at £433,000 should be afforded from the Road Fund.

*Cromwell Road Extension.*—We gave further consideration to the proposals for a new western highway into London which is intended to link up Cromwell Road, Kensington, with the New Chertsey Road and the Great West Road. The Royal Commission on Cross River Traffic, in their Report, expressed a preference for the route proposed by the Western Exits of London Society which crosses the Castelnau peninsula and involves the construction of two new bridges. We re-affirmed our preference for a route passing through Hammersmith, as described in our First Annual Report. We understand that the London County Council are considering the relative merits of the two schemes.

We hope that a decision as to the ultimate line will be reached at an early date, not only because building developments are in progress which will make the final cost of any scheme unnecessarily high, but because we consider that this question is one of urgency in view of the traffic conditions which will arise in Hammersmith when the Chertsey Road, which is shortly to be constructed, is open.

*Co-ordination of Passenger Transport.*—Our last Annual Report contained a reference to our Report\* of the 27th July, 1927, outlining the basis of a scheme for the co-ordination of the passenger services provided by the Underground and other local railways, tramways and omnibuses in the London Traffic Area. The scheme, as recommended by us, required Parliamentary sanction, but we were informed that, owing to the great pressure of business in Parliament, it was found impossible to promote a public Bill for the purpose. In these circumstances, the London County Council and the Underground Railway Group, during the year under review, promoted Parliamentary Bills, seeking powers to enable them to enter into such agreements with each other and with other undertakers as would result in the setting up of a common management and a common fund applicable to passenger transport agencies in the London Traffic Area.

We were requested to consider the proposals contained in these Bills, and a Report† was accordingly prepared and subsequently published. This Report

\* Report of the London and Home Counties Traffic Advisory Committee to the Minister of Transport giving particulars of a scheme for the Co-ordination of Passenger Transport Facilities in the London Traffic Area, 1927. Published by H.M. Stationery Office, price 4d.

† Report of the London and Home Counties Traffic Advisory Committee to the Minister of Transport in regard to the Parliamentary Private Bills promoted by the London County Council and the London Electric Railway Companies in the 1928-29 Session of Parliament. Published by H.M. Stationery Office, price 6d.

shewed that we were unable to record a unanimous recommendation, and the views of the dissenting members who were in the minority were added to the Report.

These Bills aroused considerable opposition, which alleged that the extent of public control provided for therein was altogether inadequate, and, though the opponents for the most part agreed that a system of co-ordination on the lines recommended by us in our Report of 1927 would be very desirable, they considered that the present Bills did not satisfactorily provide for such a system. The Bills were ultimately rejected on the Third Reading in the House of Commons on the 17th July, 1929.

*Travelling Facilities in North and North-East London.*—The proposed interchange station at Golders Green for omnibuses and tramcars, referred to in our previous Annual Reports and recommended in our Report on travelling facilities between Central and North and North-East London, was the subject of further negotiations throughout the year. The Underground and allied companies formulated a new scheme, involving the construction of a loop line for trams entering and leaving the station yard from Finchley Road and providing convenient accommodation for waiting passengers.

We considered that, subject to certain modifications in regard to the working of omnibuses in the station forecourt, the new proposals of the transport undertakings were the best that could be devised, but, as agreement between the parties concerned could not be secured, we met their representatives in order to ascertain whether agreement could be reached by negotiations, and these are still in progress.

*Improvements in the Dock Area.*—Suggestions were received from the Port of London Authority for extensive works of improvement in the Dock Area, including:—

- (1) A new overhead bridge over the cutting between the Victoria Dock and the Albert Dock;
- (2) A road leading from Prince Regent Lane to the new branch road to be constructed in connection with the new Victoria Dock Road scheme;
- (3) The widening of the approaches to Shadwell new entrance lock and to the new Gravel Lane lock;
- (4) The widening of Rotherhithe Street;
- (5) New bridges over the cuttings between the Norway and Lady Docks and the Surrey and Lavender Docks;
- (6) The reconstruction of the railway tunnel between the Victoria Dock and the Albert Dock at a level of at least 10 feet below the present level.

At your request, we were engaged at the close of the period under review in considering the desirability and practicability of these schemes, and, having regard to the importance of these proposals, will make every effort to expedite our report. It may be mentioned, however, that several of these proposals are identical with, or similar to, improvements we have already recommended, but which, for various reasons, it has not yet been found possible to undertake.

*Whitechapel High Street.*—In August, 1929, the London County Council commenced the reconstruction of the tramway track in Whitechapel High Street, made possible by the abolition of the hay market under the powers conferred by the London County Council (General Powers) Act, 1927. Under the procedure authorised by the same Act the Stepney Borough Council also took steps to remove the street traders from the portion of this thoroughfare between Mansell Street and Leman Street.

*Traffic in Bond Street.*—We received representations from the Westminster City Council with respect to the traffic conditions in Bond Street, the Council urging, at the instigation of the Bond Street Traders' Association, who complained of the loss and inconvenience suffered by business firms in that thoroughfare, owing to traffic congestion, that, as a first step, omnibus traffic should be entirely diverted from that street. We investigated the matter, had statistics taken of all classes of traffic using the street, and of the number of standing vehicles, and obtained other data affecting the question at issue. The possibilities



of the suggested diversion of omnibuses were reviewed by us, and we also considered certain minor road improvements designed to relieve traffic conditions in Bond Street, but in view of the many interests affected and the intricacy of some of the points raised we propose to confer further with the Westminster City Council on the whole subject.

*Road Improvement Schemes.*—During the period under review we considered a large number of road improvement schemes. Some of these were initiated by ourselves, whilst others came to our notice in connection with applications from Local Authorities for grants from the Road Fund; with representations as to the traffic conditions in particular localities; or by specific reference to us for our views. Minor improvements have also been recommended in connexion with "roundabout" or "one-way" schemes of traffic working and omnibus and tramcar stopping places.

In our last Report we referred to the protracted nature of the negotiations entailed in effecting improvement schemes of major importance. For this reason we are unable to record the actual completion of any major scheme during the period, but certain schemes have been advanced to some extent, whilst in other cases negotiations have been continued and much essential groundwork has been carried out.

Amongst the schemes considered, the following may be mentioned:—

*Acre Lane and Clapham Park Road.*—The London County Council propose to widen Acre Lane and Clapham Park Road. We recommended this scheme, subject to minor modifications in kerb lines and the provision of central refuges, for assistance, and urged the early acquisition of the property required to complete the widening of Clapham Park Road. We understand that the Council do not propose to run tramcars through these streets. If tram tracks are, however, to be laid in these thoroughfares, we are of opinion that the whole scheme should be reconsidered.

*Alleyn Park, Dulwich.*—Among the lesser improvements under consideration was one at Alleyn Park, Dulwich, which may perhaps be cited as an example of a relatively inexpensive improvement which has only been accomplished as the result of prolonged negotiations extending over a period of two years. In July, 1927, the Estates Governors of Alleyn College offered to surrender a portion of land and to dedicate it to the public, thus enabling a very necessary improvement to be effected by opening out the road junction where numerous accidents had occurred.

We recommended you to make a grant from the Road Fund towards the cost of the works. The improvement has recently been carried out, and we desire to express our thanks to the Estates Governors as well as to the Lambeth Borough Council for their assistance in improving what was previously a highly dangerous junction.

*Beresford Square, Woolwich.*—We received representations in regard to the danger and difficulties experienced by intending passengers in attempting to board tramcars in Beresford Square. It was suggested that the intending passengers should be formed into queues, and that the enclosed space at the eastern end of Holy Trinity Church should be utilised for the purpose. We approved the suggestion and advised the Woolwich Borough Council to pursue the negotiations which had been opened with the Church Authorities for the acquisition of the land in question, on the understanding that we would recommend the improvement for a grant from the Road Fund. These negotiations were successfully concluded and we recommended accordingly.

*Blackwall Tunnel Tram Terminus.* Our attention was drawn to the danger at this point to intending tram passengers, who are required to wait in a queue in the roadway. It appeared to us that some modification of the existing conditions was necessary, and we formed the view that the difficulties could be overcome by the continuation of the present single track alongside the western wall of the tunnel approach, and that for the convenience of intending passengers, a shelter should be erected on the footpath alongside the tunnel wall. The London County Council have been asked to give consideration to these proposals.

*Elephant and Castle Area.*—In our First Annual Report we stated that it would probably be necessary in the next few years to consider the construction of a wide ring road round this area, and we understand that negotiations with



reference to such a scheme are in progress with the London County Council. In view, however, of its complicated nature and the difficulties likely to be involved with regard to the acquisition of property no definite decision has yet been reached as to the works to be undertaken to improve the existing traffic conditions with a minimum of expenditure and disturbance of local interests.

*Eltham By-Pass junction with Court Road, Mottingham.*—A widening at this junction, which would have the effect of removing the existing "bottle-neck," was suggested by the Woolwich Borough Council. We approved the proposal and recommended that, subject to the incorporation of certain minor improvements in radius of kerb lines, lighting, etc., the improvement should be assisted by a grant from the Road Fund.

*Gravesend Ferry.*—As a result of representations received regarding the facilities provided by the Gravesend-Tilbury Ferry, an inspection was made in company with representatives of the Gravesend Town Council and the London, Midland and Scottish Railway Company. After exploring the vicinity and examining the approaches to the ferry, we formed the opinion that considerable improvement could be effected by the execution of road improvements in Gravesend. The representatives of the Council undertook to prepare an improvement scheme on these lines.

There can be no doubt that in the near future additional facilities will have to be provided for crossing the Thames below Woolwich. The Royal Commission on Cross-River Traffic recommended that the Gravesend-Tilbury Ferry should be acquired by the public and placed on the same basis as the Woolwich Free Ferry, and that the construction of the Dartford-Purfleet Tunnel, including the approaches linking up with the arterial roads, which is described in our First Annual Report, should be proceeded with.

*High Street, Watford.*—A number of representations with regard to unsatisfactory traffic conditions in the vicinity of High Street, Watford, was brought to our notice.

This locality is typical of many others in the outskirts of London, where the layout of what were formerly more or less provincial towns has become entirely inadequate to accommodate the volume of through traffic, apart from the greatly increased local traffic. The Borough Council submitted a scheme which provided for the widening of the carriageway and the footpath of the High Street by taking in the Old Market Place. We recommended this improvement for assistance from the Road Fund.

*King's Cross.*—We have had under consideration for some time past the traffic conditions in the vicinity of King's Cross Station. This locality is an example of a nodal point in a built-up area where traffic difficulties of a particularly acute nature are due to the layout. The junction of Pentonville, Euston, Gray's Inn, and York Roads at this point presents many difficulties for pedestrians. Some idea of the volume of traffic may be gathered from the fact that a short period census taken on a week-day in June, 1928, showed that some 2,100 vehicles and about 100 tramcars per hour passed through this junction. Investigations made to ascertain the practicability of re-arranging the routes taken by traffic in the vicinity showed that the existing routing is as satisfactory as can be devised without the expenditure of large sums of money. It therefore appeared to us that improvement in the traffic conditions lay in the direction of street widenings, the improving and enlarging of refuges, the provision of crossing-place notices, and alterations to the omnibus and tramcar stopping places. The stopping places were duly altered, and we are of opinion that this has facilitated the flow of traffic. The co-operation of a number of Authorities will, however, be required to carry the remaining improvements into effect, and it is to be feared that a considerable time may elapse before this can be done. We are of opinion that in the interests of pedestrian traffic the provision of subways in this area will be necessary.

*Kingston-upon-Thames.*—The situation and layout of this town create conditions of extraordinary traffic difficulties during the summer and at week-ends, and we have had discussions with representatives of the Surrey County Council and the Kingston Town Council regarding the use of alternative routes to by-pass its most congested streets. On our suggestion a Joint Committee of these two

authorities was set up and submitted proposals which we examined in detail. We were also furnished with reports as to traffic conditions in Kingston both on ordinary days and during week-ends, including the volume of traffic passing through the principal streets, the number of standing vehicles, and the facilities for parking.

It appeared to us that the proposals of the Joint Committee were generally satisfactory, and we have recommended them, together with other proposals, for adoption. The proposals involve a system of "one-way" traffic working, the provision of adequate signposts for the routing of vehicles, together with certain road widenings, the construction of a short slip road, the strengthening of a bridge, and the re-arrangement of tramway tracks at road junctions. The estimated cost of the works under consideration amounts to approximately £42,500, and we are of opinion that when effected they will secure a great improvement in traffic facilities in Kingston.

*King William Street Subway.*—We had under consideration a proposal for the construction of a subway for pedestrians at the junction of King William Street, Cannon Street, and Gracechurch Street. The proposed subway would cross King William Street just south of the King William statue and would have connections to the footpaths on both sides of the street and to the pavement on the north side of the statue. Provision would also be made for a connection to the Monument Railway Station. The approximate estimate of cost furnished to us was £35,000. In view of the value of pedestrian subways from a safety point of view we consider the proposal eminently desirable, and we would be glad to hear that the City Corporation are prepared to carry it into effect.

*New Chertsey Road.*—We were kept informed as to the progress made in the construction of the New Chertsey Road, and were furnished with plans showing the proposed lay-out of road junctions on the section authorised by the Act of 1928, which empowered the Surrey and Middlesex County Councils to construct new bridges at Chiswick and Richmond with approach roads thereto. We suggested certain modifications in these plans so as to provide for greater safety, including in the case of one of the junctions the adoption of a lay-out which will enable a "roundabout" system to be introduced if the volume of traffic should warrant such a course.

*North End Road, Fulham.*—Proposals by the Fulham Borough Council for a widening of the North End Road on its eastern side of a length of 300 yards were considered. We had already recommended for financial assistance a scheme for the construction of a new by-pass road, 60 feet wide, from a point north of the bend by the Cedars Hotel to Edith Road. In view of the traffic importance of North End Road, we made a similar recommendation in favour of the present proposal.

*Petersham Road.*—We investigated the traffic conditions prevailing in the narrow portion of Petersham Road, Richmond, between the junction with Hill Rise and Compass Hill, where acute congestion is often experienced during the summer season. We ascertained that the Local Authorities concerned had provided, in their town planning schemes, for the widening of this thoroughfare, and we were furnished with plans showing alternative schemes. At the same time we were informed of protests received from local residents against any such scheme on account of the disturbance of local amenities. After reviewing the circumstances, it appeared to us that the widening of Petersham Road was essential. Having regard to the long time which must necessarily elapse before the whole scheme would be completed, we consider it would be an advantage if the work were done in stages, a commencement being made so far as is practicable on those sections of Petersham Road where there is barely sufficient width for two lines of traffic.

*Street improvement in St. Marylebone.*—Having regard to the fact that considerable rebuilding operations have recently been proceeding in St. Marylebone, the Borough Council consulted us as to the possibility of securing street improvements at a minimum cost, and invited our suggestions in respect of desirable widenings and rounding-off of corners, which could be effected while the building operations were in progress or under consideration.

As a result of our enquiries into this matter we made a number of recommendations which have been communicated to the Borough Council.

We consider that the procedure adopted by the St. Marylebone Borough Council is highly commendable, and we have thought it well to report their action to you in order that other Local Authorities may be encouraged to proceed in the same manner.

Our enquiries into this matter prompted us to consider the possibility of defining the general standards to be adopted in the lay-out of street corners in thoroughfares having considerable traffic value, and we recommended that the following standards should be applied to all corners on streets scheduled under Section 4 of the London Traffic Act, *i.e.*, all the more important traffic arteries :—

(a) Wherever possible the kerbing at the corners of street junctions should have a radius of not less than 30 feet or more than 50 feet. (*Note.*—30 feet is the shortest turning radius for lorries and large cars, while if the radius exceeds 50 feet the rounding off is too gradual and pedestrians are exposed to risk of accident by vehicles from behind making the left hand turn.)

(b) Where buildings or fence walls over 3 feet high are to be built up to the footpath the line of sight should be preserved by splaying the corner of the building or wall. It would be assumed for the purpose of measuring this splay that the kerb is laid to a 30 feet radius whether or not this has actually been contemplated or carried out. The distance from this assumed kerb line on the corner to the splayed face should not be less than 25 feet measured on a line at right angles to that splayed face. It thus follows that if both the footways on the corner are 25 feet wide or over no splaying would be necessary.

*South Circular Road.*—In connection with our review of the proposals covered by the London County Council (General Powers) Bill, 1929, we examined the plans for the lay-out of certain junctions on this road. It appeared to us desirable that the lay-out of the junction with Shooters Hill By-Pass and Well Hall Road should be such as would enable a "roundabout" system to be operated, and negotiations regarding the necessary modifications are in hand with the London County Council.

Similar considerations arose in connection with the junction with the Eltham By-Pass (Sidcup Road) and we recommended a lay-out suitable for the operation of a "roundabout" system. Our consideration of this road junction gave rise to a point of some interest with regard to the position of tramway tracks in "roundabout" areas. It had been suggested to us that at junctions where it is proposed to introduce a "roundabout" system, and where tramcars are to be run, no provision should be made for vehicular traffic to pass between the central island and the tramway track, but we did not see our way to adopt this suggestion for the following reasons :—

(1) All tramcars entering or leaving the "roundabout" would need to make a direct cut across all the streams of traffic in the "roundabout."

(2) Unless space is available between the tramway tracks and the central island to enable traffic to move freely, the efficiency of the "roundabout" for handling traffic would be considerably reduced, as cross cuts would become more awkward in the confined space.

It was therefore decided to adopt the lay-out illustrated in Appendix III which meets both the foregoing objections. Whilst generally it is considered that the most suitable position for tramway tracks in a "roundabout" is the centre of the carriageway, some departure from this principle is desirable to meet particular cases. For instance, if this principle were adopted at the junction in question where a 40 feet carriageway is proposed, more space than is necessary for one line of traffic, but insufficient for two lines, would be available on each side of the tracks. Under the lay-out recommended, however, space is provided for two lines of traffic outside the tracks, and for one line between the central island and the tracks, but if it should be found necessary at any future time to increase the width of the carriageway in the "roundabout" centre, it would be possible to take off 10 feet from the central island without interfering with the tramway tracks.

The junction of Westhorne Avenue and Eltham Road was considered, and was also made the subject of a recommendation for the adoption of a lay-out suitable for a "roundabout" system. In this case also the proposed lay-out

involves the re-arrangement of the tramway tracks so that the tramcars, in common with other forms of traffic, could circulate round the central island.

We further recommended that the carriageway width on the section of the South Circular Road which is to be traversed by tramways should be 66 feet 8 inches, which would permit of two lines of traffic in each direction, together with refuges each 4 feet wide on either side of the double track, the extra expenditure entailed to be assisted by a grant from the Road Fund.

*Watford and Barnet By-Pass Roads.*—In consultation with the highway authorities concerned, we are bringing under review the lay-out of the various junctions along the Watford and Barnet By-Pass Roads. In this connection the Middlesex County Council inquired whether any scheme was in contemplation for the ultimate lay-out of the junction of the Watford By-Pass with Spur Road at Green Lanes, Stanmore, which would be suitable for the introduction of a "roundabout" system. It appeared to us that such a system might be necessary when the bridge over the London, Midland and Scottish Railway is completed and when the road east of the junction has been developed. We, therefore, recommended that land should be acquired to permit of a "roundabout" system being introduced at such time as traffic requirements might warrant.

*Whitefoot Lane, Catford.*—Representations were received from the Lewisham Borough Council urging a widening of Whitefoot Lane to a width of 70ft. on the grounds that the London County Council had already decided to widen Southend Road to 70ft. and that unless Whitefoot Lane, which formed a direct continuation eastwards of Southend Road, was also widened, the value of the improvement would be discounted. We agreed with this point of view and, on our advice, the London County Council were asked to sterilise the land required for this improvement, although the carrying out of the widening is not in our view a matter for immediate action.

*Woodcote Road, Wallington.*—The proposal of the Surrey County Council to widen Woodcote Road between Wallington Station and Stafford Road was brought to our notice, and whilst concurring in the desirability of this improvement, it appeared to us that attention should be given to the conditions on the section of this road under the railway bridge regarding which representations as to the risk of accidents to pedestrians and vehicles had been received. We therefore recommended that the Surrey County Council should be urged to consider the incorporation of this additional improvement in their proposal and we understand that the Council and the Southern Railway Company are now in negotiation respecting the reconstruction of this bridge.

In addition to the schemes referred to above, we also made recommendations regarding street improvements in the following localities:—

The junction of Buckingham Palace Road, Pimlico Road and Ebury Bridge Road.

The junction of Westminster Bridge Road and Kennington Road.

Camden Road junction with Holloway Road and Tollington Road.

The junction of De Beauvoir Road and Englefield Road, Dalston.

The junction of Lower Clapton Road and Downs Road, Hackney.

New Cross Road.

Herne Hill.

Victoria Park Road, Hackney.

Foxley Lane, Coulsdon.

Although few, if any, of the foregoing schemes can be considered of major importance, yet, in our view, the cumulative benefits resulting from the gradual execution of minor improvements, as and when the opportunity occurs, are not to be deprecated.

*Tramways.*—The following proposals for the doubling and reconstruction of tramway tracks in certain localities came before us during the year under review.

(a) *Plasht Grove.*—The East Ham Corporation submitted a proposal for the doubling of a portion of their tramways in Plasht Grove, between Grangewood Street and Green Street. The Corporation also proposed to effect a road widening concurrently with the tramway reconstruction, and as this widening would provide the statutory clearance required

between the tram rail and kerb we recommended that the scheme should be approved.

(b) *Prince Regent Lane*.—The West Ham Corporation submitted a scheme for doubling a small length of single line in Prince Regent Lane from which it appeared that there would remain a margin of only 2ft. 3in. between the tram rail and the kerb on one side of the road. It was, however, found that the widening of this thoroughfare would be impracticable, and as similar clearances have already been permitted in other streets where the volume of traffic is not heavy, we advised you that no objection need be raised to this particular proposal.

(c) *Proposed tramway through Broad Lane and Ferry Lane, Tottenham*.—Plans of a proposal by the Middlesex County Council to construct a tramway through Broad Lane and Ferry Lane, Tottenham, were laid before us. This tramway, which will form a connection between the existing tramways in Tottenham and Walthamstow, has been under consideration for many years, and when completed will be a valuable addition to the travelling facilities in the neighbourhood. While we were most anxious to avoid putting forward any objections likely to delay this scheme, we found it necessary to draw attention to the fact that at certain points clearances of only 7ft. 3in. would be provided on either side of the tram track. We accordingly recommended that the matter should be further discussed with the Middlesex County Council, with a view to arranging, if possible, some widening at these points. We understand that negotiations are in progress in regard to this matter.

(d) *High Road, Wood Green*.—We considered the plans for the reconstruction of the tramway track in High Road, Wood Green, between Turnpike Lane and Lordship Lane, and ascertained that in these proposals the tracks were sited in positions conforming to a widening on the western side of the road which would be carried out concurrently with the track reconstruction work. We were also informed that the railway bridge at Noel Park Station, under which the tram track in question runs, would be widened at some future date. In these circumstances we decided to recommend that the proposals were satisfactory.

(Note.—Section 3 of the Act deals with the power of the Committee to hold inquiries.)

#### SECTION 4.—CLOSING OF STREETS FOR WORKS.

The powers conferred upon you by this section which enable you to arrange for the co-ordination of works of repair of all main thoroughfares in the London Traffic Area so as to reduce as far as possible the inconvenience to traffic and to ensure that alternative routes are left unobstructed, have continued to be of great value to the circulation of traffic. As stated in our previous Reports, however, we consider that the section, as at present framed, is inadequate for securing the fullest relief to traffic congestion resulting from street works. Our continued experience of the working of this section confirms our view that if, and when, the London Traffic Act is amended, this section should be remodelled to confer additional powers on you. In this connection we would refer to the views expressed in our last Annual Report regarding the co-ordination of statutory undertakers' works, and the extension of the period of protection from disturbance by statutory undertakers of streets repaired in accordance with the arrangements made under this Act.

During the period under review our attention was drawn to several cases where minor road works had been responsible for extensive traffic delays on important thoroughfares. Such works should in our opinion be carried out either at night-time or during the week-end. We understand that these views were conveyed to the Road Authorities and undertakers in the Central Area who have the power to open streets, and that replies were received from the majority of such undertakers to the effect that these suggestions would be adopted where practicable.

We are pleased to report again that undertakers for the most part have displayed a general desire to co-operate in the working of this section, and that many of them have given prior notice of their larger works, thus making it possible to co-ordinate these with the programmes of works of the highway authorities.

In our view, however, the whole subject of the interruption to traffic by disturbances of the highway is an exceedingly difficult problem and we need only refer to the Holborn explosion, the escape of gas in New Bridge Street and the remarkable series of burst water mains during the early part of 1929, to illustrate the sudden and serious dislocations of traffic which are likely to occur anywhere at any time, and which cannot be foreseen. We consider that traffic conditions make it increasingly necessary that, so far as possible, arrangements should be made to provide access to service pipes and mains with the minimum of disturbance to the road surface and in this connection would refer to the recommendations contained in our last Annual Report regarding routes for new trunk lines, location of new junction access boxes, and the construction of subways to carry all necessary mains and pipes, etc.

Following the normal procedure for the working of this section, draft schemes of works were prepared for the six monthly periods commencing the 1st April, 1929, and 1st October, 1929, and after examination by us were confirmed by Orders.

The circulation to the Press and Local Authorities of the weekly statement of street repairs was continued with, it is believed, useful results.

#### SECTION 5.—PROVISION FOR MITIGATING OBSTRUCTION TO TRAFFIC.

Under this section the Police are empowered to report to the highway authority of the area concerned, cases where undertakers having power to break up streets in the London Traffic Area cause obstruction to a greater extent or for a period longer than is reasonably necessary. The highway authority is then obliged to make an inspection and, if necessary to require the undertakers by notice in writing to mitigate or discontinue the obstruction. If the undertakers fail to comply with such notice within 24 hours of its receipt, the highway authority may themselves take the necessary steps, and may recover summarily from the undertakers, as a civil debt, any expenses properly incurred by them in connection therewith.

According to information furnished by the Police authorities in the London Traffic Area, seven cases, which may be summarised as follows, were reported by the Police to the highway authorities concerned during the 12 months ending 30th November, 1928.

Complaints that a greater obstruction than necessary was caused	1
Complaints relating to obstructions being left for a period longer than was considered necessary	5
Complaints falling within both the foregoing categories	1
Total	7

The following table indicates the nature of the various works in connection with which the above-mentioned reports were made by the Police:—

Tramway works	2
Gas mains	1
Water mains	1
Electric cables	3
Total	7

The total number of cases for the 12 months is only one-third of the total for the preceding 12 months. We understand that in no case did any of the undertakers concerned make any representations to you, as they are entitled to do under the provisions of this section, to the effect that the obstructions complained

of were not greater or had not been continued for a longer period than was reasonably necessary. It appears to us that undertakers are generally alive to the necessity of causing as little obstruction as possible to traffic, and this accounts for the fact that it has not been necessary to make extensive use of the provisions of this section, the chief value of which lies in its preventive effect.

#### SECTION 6.—POWER TO ATTACH CONDITIONS TO THE GRANT OF LICENCES TO PLY FOR HIRE WITH OMNIBUSES IN THE CITY OF LONDON AND THE METROPOLITAN POLICE DISTRICT.

The duty of administering the provisions of Section 6 devolves almost entirely upon the Commissioner of Police of the Metropolis as the licensing authority for the City of London and the Metropolitan Police District. In certain circumstances, however, the Section provides for an appeal to you. During the period under review one appeal was made to your predecessor by an omnibus proprietor against the suspension of an omnibus licence held by him. As the result of an inquiry, at which the parties concerned were represented, the appeal was disallowed.

#### SECTION 7.—POWER TO LIMIT THE NUMBER OF OMNIBUSES PLYING ON CERTAIN STREETS WITHIN THE CITY OF LONDON AND THE METROPOLITAN POLICE DISTRICT OR TO LIMIT THE NUMBER OF OMNIBUS JOURNEYS.

The restrictions referred to in our previous Reports, together with the further restrictions imposed on our advice by your predecessor during the year, to which reference is made below, have prevented any considerable increase in the number of omnibuses plying for hire in the City of London and the Metropolitan Police District, and the omnibus position in those areas has, generally speaking, remained stabilised. In some few instances, omnibus proprietors have been able to bring additional vehicles into use by running services over streets which have not been declared restricted, while other increases are due to the re-arrangement of workings, which although necessitating the employment of additional omnibuses, do not involve additional journeys over restricted streets.

On the 1st July, 1928, the total number of omnibuses scheduled for regular operation in the Metropolitan Police District was 4,807,\* while on the 1st July, 1929, the total was 4,881, showing an increase of 74 vehicles, of which 17 were placed into service by proprietors not connected with the London General Omnibus Company or Associated Companies.

On our advice, Regulations† were made on 21st December, 1928, prohibiting the running of additional omnibuses on streets which had been declared to be restricted streets by Order‡ dated 18th December, 1928. We recommended that this action should be taken in order to prevent any further increase in the number of omnibus journeys operated on streets already used by omnibuses, and to prohibit the operation of omnibuses on the remaining streets, until you were satisfied that additional omnibuses or new services were necessary to meet the requirements of the public.

We stated in our last Report that your predecessor had accepted certain recommendations which we had made with a view to reducing the number of omnibus journeys on the tramway route between Brixton and Purley.

In view, however, of certain difficulties which subsequently arose, we gave further consideration to the matter, and submitted recommendations in respect of an amended scheme which provided for a considerable reduction in the number of omnibus journeys which the London General Omnibus Company and their Associated Companies were entitled to run between Kennington Gate and South Croydon. Effect was given to these recommendations by Regulations§ dated

\* The figure shown in the Third Annual Report of the London and Home Counties Traffic Advisory Committee for the year 1927-28, viz., 4,809 should read 4,807.

† The London Traffic (Restricted Streets) (No. 3) Provisional Regulations, 1928, dated 21st December, 1928.

‡ The London Traffic (Restricted Streets) (No. 3) Order, 1928, dated 18th December, 1928.

§ The London Traffic (Restricted Streets) Amendment (Croydon Services) Provisional Regulations, 1929, dated 22nd March, 1929.



22nd March, 1929. It should be observed that these Regulations did not require the " independent " omnibus proprietors on the route to reduce their operations.

During the year we have also considered proposals for reducing the number of omnibus journeys on the tramway route between Edgware Road and Sudbury, and following certain recommendations which we submitted in the matter. Regulations\* were made on 14th May, 1929, to give effect thereto.

We gave further consideration to the representations of the London County Council in regard to the adverse effect which increased omnibus competition on Sundays has had upon the receipts of the Council's tramways during recent years. In view of the relevant considerations set out in our last Report, we decided that we could not at the present time recommend you to place any restriction on omnibus services on Sundays.

During the year we have had under consideration the question of the extent to which important streets in the centre of London are congested as a result of the running of omnibuses in excess of requirements during the slack hours, and the measures which might be taken to reduce the number of omnibus journeys during any part of the day. This is a matter which presents considerable difficulty, principally from an operating point of view, and to assist in our examination of the subject, up-to-date information is being obtained in regard to the loadings of omnibuses on the various routes concerned during the slack hours.

In 1927, we came to the conclusion that there were enough omnibuses in service in the Metropolitan Police District and the City of London to provide for all requirements of the travelling public then and for some time to come, and we accordingly made a recommendation, in which your predecessor concurred, that amendment regulations to permit of the operation of new and extended omnibus services should not be made if they would have the effect of increasing the aggregate number of omnibuses upon the London streets; and that applications to run new or extended omnibus services involving the use of additional vehicles should only be granted on condition that the additional vehicles to be brought into use should be found from those displaced or removed from other routes.

This condition was successful in attaining the object which we had in view, namely, the transference of omnibuses from congested routes, and routes served by tramways, to new routes in the outer area where the need for travelling facilities was growing, but when in October, 1928, the speed limit for omnibuses fitted with pneumatic tyres was increased from 12 to 20 miles per hour, it became possible for omnibus proprietors who equipped their vehicles with pneumatic tyres to run considerably increased mileage without the introduction of any additional omnibuses, and the condition referred to thus failed to be effective.

Furthermore, experience had shown that the basis of adjustment according to the number of omnibuses in service was difficult of application in connection with certain proposals for modifications of existing services which came before us, where it was contemplated to run additional journeys over restricted streets without the introduction of additional omnibuses.

We accordingly made a recommendation, in which you concurred, that the amendment of the Restricted Streets Regulations to permit the operation of new or extended omnibus services which are justified on traffic grounds should only be made in those cases in which the omnibus proprietor concerned would be prepared to make a corresponding reduction in the mileage operated by him on some other restricted route.

You have approved our recommendation that the numerous Restricted Streets Orders, Regulations and Amendment Regulations which have been made from time to time under Section 7 of the London Traffic Act, 1924, should be consolidated, and that in this connection the opportunity should be taken of affording omnibus proprietors some degree of latitude in the compilation of their schedules so as to avoid the necessity of applying to you for the amendment of the Restricted Streets Regulations in the case of minor adjustments of services.

We recommended that the proposed Regulations should permit of the following alterations being made to services provided that there is no increase in the

\* The London Traffic (Restricted Streets) Amendment (Harrow Road Services) Provisional Regulations, 1929, dated 14th May, 1929.



aggregate number of journeys which a proprietor may run in the course of a day on any route :—

(1) *On weekdays other than Saturdays.*

(a) Before 11 a.m. and after 4 p.m. the number of journeys run on any route in any hour may be increased by 20 per cent. with a minimum of one and a maximum of four.

(b) Between 11 a.m. and 4 p.m. the number of journeys run on any route in any hour may be increased by one, provided that there is no increase in the aggregate number of journeys run in that period.

(2) *On Saturdays.*

The number of journeys run on any route in any hour may be increased by 20 per cent. with a minimum of one and a maximum of four.

(3) *On all weekdays.*

Operation on any route may be commenced an hour earlier or continued an hour later than is at present permissible, provided that the number of journeys to be run in such additional hour shall not be greater than the number of journeys which can at present be run in the first or last complete hour, as the case may be, of the day's operations on the route.

The proposed consolidation will simplify the position to a considerable extent from the point of view of the Ministry, the Police, and the various omnibus proprietors, as the numerous Orders and Regulations now in force, which it is necessary to construe by reference to each other, will be revoked, and so soon as the Consolidation Order is made it will only be necessary, in order to determine the number of journeys which a proprietor may run over any restricted street, to refer to one principal Order and set of Regulations. There can, of course, be no finality in this matter so long as Section 7 of the London Traffic Act remains in force in its present form, and Orders and Regulations will have to be made from time to time as circumstances require, and, at some future date, it will doubtless be necessary to consolidate these again.

We considered a large number of applications during the year for the amendment of the Restricted Streets Regulations to enable new or increased omnibus services to be run, and on our advice numerous amendment regulations have been made to permit of the operation of such of these services as appeared to us to be necessary in the public interest.

Amongst the services thus provided the following may be mentioned :—

(a) A new service between Barking and Beckton, providing omnibus facilities in substitution for the tramway service which had been withdrawn between those points.

(b) An augmentation of the service between Leytonstone and Dagenham via Ilford and the Eastern Avenue providing additional travelling facilities for the residents on the London County Council's housing estates at Becontree and Dagenham.

The Restricted Streets Regulations enable you after consulting the Committee, by giving notice in the "London Gazette," to dispense with or to relax the restrictions on any occasion, either generally, or in the case of particular streets or parts thereof. During the period under review the Regulations have been relaxed on several occasions in connection with important public events, etc., calling for special traffic facilities.

## SECTION 10 AND THE THIRD SCHEDULE TO THE ACT.

*Power to make Regulations.*—Powers are conferred on you by this section to make Regulations for relieving congestion and facilitating traffic in the London Traffic Area and such Regulations may relate to any of the matters set out in the Third Schedule to the Act. Before making such Regulations you are required to refer the matter to us for our advice and report and, when made, the Regulations are to be laid before both Houses of Parliament.

Questions affecting or requiring the making of Regulations have continued to be dealt with by Standing Sub-Committee No. 1, under the Chairmanship of Mr. Frank Pick, and Standing Sub-Committee No. 2 under the Chairmanship

of Alderman Ben Smith until 1st December, 1928, when he resigned from the Sub-Committee, and when Alderman W. G. Davie was appointed in his place. The duties of these Sub-Committees have already been outlined at the commencement of this report.

The following paragraphs record our deliberations with respect to various matters dealt with under the above-mentioned Section and the Third Schedule to the Act.

*Review of Regulations made under Section 10 of the London Traffic Act, 1924.*—During the period under review we commenced an investigation into the practical working of the Regulations already made, on our advice, under the above-mentioned Section of the Act and we were satisfied that those relating to the Lighting and Guarding of Street Works,\* Reversing in Streets, Advertising in Streets, and Exceptional Loads,† had assisted in facilitating the flow of traffic and that there was no need to amend them at present.

Our review of the Regulations relating to Unhired Cabs,‡ Broken Down Vehicles§ and the Collection of Refuse,|| indicated that some amendments may be necessary and we are therefore continuing investigations into these matters.

The results of our review of the Regulations relating to the Loading and Unloading of Vehicles,¶ Parking Places\*\* and Prescribed Routes†† are given below.

*Loading and Unloading of Vehicles and Waiting Vehicles.*—We have had under examination the working of the existing Regulations covering the area of Piccadilly Circus and short lengths of streets leading thereto and in the light of the experience gained have advised that it is necessary that steps should be taken to reduce the inconvenience caused to traffic in certain of the more congested streets in the Central London area by vehicles waiting for the purpose of loading and unloading or for picking up or setting down persons. The presence of waiting vehicles in congested thoroughfares is an impediment to the flow of traffic, and we consider that certain types of vehicles standing by the kerb are a source of danger as they obscure the view of drivers of other vehicles, as well as of pedestrians wishing to cross the road.

Since the Regulations now in force have proved of value in the vicinity of Piccadilly Circus, particularly at the peak traffic hours, we considered that it would be desirable to extend their scope and area of operation. You have acted upon our advice and given notice of your intention to make new Regulations prescribing areas at Marble Arch, St. Giles' Circus, as well as Piccadilly Circus, and short lengths of the thoroughfares leading into these areas, where, between certain hours of the day, restrictions would be imposed upon vehicles waiting either for the purpose of picking up or setting down persons or for loading or unloading goods and merchandise.

We attach considerable importance from a traffic point of view to the elimination of congestion caused by waiting vehicles, particularly as the erection and reconstruction of extensive buildings now proceeding in many parts of London will necessarily attract a large volume of traffic and thus add to the existing traffic difficulties. We consider, however, that we should be guided by experience, and therefore recommend that these new Regulations should be regarded as an experiment for a period of six months. It is understood that you concur in this view.

The subject of waiting vehicles is closely allied to the question of the provision of parking places which engages our constant attention and to which reference is made below.

\* The London Traffic (Lighting and Guarding of Street Works) Regulations, 1927 (S. R. & O. 1927, No. 57).

† The London Traffic (Reversing in Streets, Advertising in Streets and Exceptional Loads) Regulations, 1928 (S. R. & O. 1928, No. 87).

‡ The London Traffic (Unhired Cabs) Regulations, 1927 (S. R. & O. 1927, No. 786).

§ The London Traffic (Broken Down Vehicles) Regulations, 1925 (S. R. & O. 1925, No. 906).

|| The London Traffic (Collection of Refuse) Regulations, 1927 (S. R. & O. 1927, No. 101).

¶ The London Traffic (Loading and Unloading of Vehicles) Regulations, 1928 (S. R. & O. 1928, No. 443).

\*\* The London Traffic (Parking Places) Regulations, 1928 (S. R. & O. 1928, No. 27).

†† The London Traffic (Prescribed Routes) Provisional Regulations, 1928, dated 6th February, 1928.

*Parking Places.*—In our Third Annual Report it was stated that further applications for the appointment of new, and the revision of existing, parking places had been received and were under consideration. We have submitted our report upon these applications, and on the 7th May, 1929, public notice was given of your intention to make revised regulations.

Following this announcement a number of representations upon the proposals embodied in the revised regulations was referred to us for advice and report and among these, two call for particular notice, viz. :—

(1) That the maximum period of waiting at parking places should be extended beyond two hours after 7 p.m. and at week-ends.

(2) That drivers should be permitted to lock their cars when parking at an angle to the kerb.

On the first point we remain of the opinion expressed in our First Annual Report, 1925, and again in our Report on Parking Places in 1927,\* that parking upon the public street is a privileged use of the highway, and should be confined to the irreducible minimum. We view with concern the increasing congestion caused through vehicles standing in the streets and are not disposed to favour any extension of the facilities at present afforded for parking cars after 7 p.m. on weekdays and during week-ends.

With regard to the suggestion that drivers should be permitted to lock their cars when parking at an angle to the kerb upon an authorised parking place, it appears that there is some misconception as regards this matter. Neither the existing or the proposed Regulations prohibit the locking of cars whilst upon an authorised parking place, but there is a provision that vehicles shall be so left that they may be removed from one position to another by manual power. Such a provision is, in our opinion, essential in those localities where vehicles are parked head to tail, and we see considerable difficulty in recommending any exception in the case of the small number of parking places where cars are parked at an angle to the kerb, as there are obvious disadvantages from an administrative point of view in having varying Regulations relating to different parking places.

We were much impressed by the large number of offences committed against the Parking Place Regulations, the greatest number being in respect of exceeding the maximum time of waiting. We came to the conclusion that the fines imposed were not sufficiently heavy to deter a certain class of motorist from habitually breaking the law and we were informed that such persons did not even trouble to attend the Courts. In order to ensure that the fines should act as an adequate deterrent in the future we have recommended that the Regulations should be amended so as to provide for the imposition of a fine not exceeding, in the case of a first offence, £5, or in the case of a second or subsequent offence, £10, instead of the maximum penalty of £5 in all cases as at present.

Various amendments, additions, and deletions to the schedule of the existing Regulations were also considered desirable and we understand that you have accepted our recommendations upon the foregoing matters.

We have also recommended that arrangements should be made for each parking place to be adequately marked by means of a sign, a notice plate bearing an extract from the Regulations, and markings in the carriageway indicating the limits of the car park. The signs bear the letter "P", as suggested by the League of Nations for international use, while we advised that the notice plates should be sign-written upon vitreous enamel plates, and that the proposed markings in the carriageway should be of stainless steel studs. We are of opinion that these signs and markings will be of assistance to the police in the regulation of traffic, as well as to the motoring public, and we understand that you have made arrangements to give effect to our recommendations in this respect.

In the course of our consideration of various applications for the appointment of parking places we have found it necessary to maintain the principles previously adopted by us, viz., that parking places should be established solely for the purpose of relieving congestion and facilitating the flow of traffic, and that their appointment for the convenience of theatre patrons or any particular

\* The Report of the London and Home Counties Traffic Advisory Committee on Parking Places, 1927, published by H.M. Stationery Office, price 4d. net.

institution or organisation could not be justified. In recommending the approval of parking places upon the public highway we have, however, had regard, as far as possible, to business interests and local amenities.

During the past year we investigated a scheme submitted by the British Legion for the supervision of vehicles at parking places by disabled "ex-Service" men. Under the present arrangements, which are described in our First Annual Report, car park attendants are licensed as "messengers" in the Metropolitan area by the Commissioner of Police. These attendants do not receive any remuneration, but rely solely on such gratuities as they may receive, and, accordingly, it has only been found practicable to have attendants at the more frequented parking places, that is to say, those at which the gratuities received are sufficient to attract suitable men. The messengers are issued with a licence, a badge, and a supply of tickets with counterfoils, and are recruited from various "ex-Service" and benevolent associations connected with the public service vehicle trade.

We have previously given consideration to representations received from time to time that these messengers should be paid a weekly wage, and while realising that the existing system is by no means ideal, we have been unable to suggest any practicable and satisfactory alternative. In these circumstances, we were pleased to have an opportunity of enquiring into the scheme evolved by the British Legion which, it was hoped, would meet to a considerable extent the present unsatisfactory position under which the attendants rely solely upon gratuities for their remuneration.

The scheme contemplated the appointment of a suitable person to superintend the attendants of the authorised parking places in the Metropolitan Police District and the payment of a standing wage and the supply of uniforms, etc., to supervisors and attendants, a charge being made to motorists for the facilities provided. Tipping was to be discouraged or even suppressed. Whilst the British Legion would not make themselves responsible for the safety of the cars or their contents, it was intended that the attendants should, to the best of their ability, afford protection against loss or theft.

The advice we received was to the effect that there is no power vested in anyone to make a charge for parking a vehicle upon the public highway, neither is there power to require a fee to be paid by the person in charge of the vehicle for the services rendered by an attendant. After exploring every possible avenue in an endeavour to effect an improvement upon the present conditions, and whilst fully sympathising with the objects and desires of the British Legion, we felt that it would not be practicable, so far as the Metropolitan Police District is concerned, to accede to the suggestions which they had been good enough to make.

Our attention was called to the congestion arising in thoroughfares in the neighbourhood of the Zoological Gardens by reason of standing motor coaches which convey parties to the Gardens from various parts of the country. Negotiations were opened with the interested parties, viz., the Commissioner of Crown Lands, the First Commissioner of Works, the Zoological Society, the St. Marylebone and St. Pancras Borough Councils, and the Commissioner of Police of the Metropolis, and we are pleased to report that, with the co-operation of these parties, it has been found possible to utilise Cumberland Market, which is not a public highway, as a parking place for these vehicles, a small charge being made for their accommodation during the day.

The influx of large numbers of motor coaches into the Metropolis is a matter which is causing some disquietude, and we anticipate that the increasing employment of this type of vehicle will render it necessary at an early date to take steps to ensure that motor coaches, during their period of waiting in the Metropolis, shall be accommodated off the public highway.

*Prescribed Routes.*—On the 22nd November, 1928, Provisional Regulations\* were made prescribing the routes to be followed by traffic in the following localities :—

Bessborough Gardens, Westminster.  
Marylebone Lane and Somerset Street, St. Marylebone.

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\* The London Traffic (Prescribed Routes) Amendment (No. 3) Provisional Regulations, 1928, 22nd November, 1928.

The junction of Great Western Road, Harrow Road, Waltherton Road, Fernhead Road, and Elgin Avenue, Paddington.  
 Park Avenue and Barratt Avenue, Wood Green.  
 Featherstone Street and Leonard Street, Finsbury.  
 Catherine Street and Vince Street, Shoreditch.  
 Richmond Hill.  
 Red Lion Street, Richmond.  
 Kingston By-Pass and Kingston Vale.

Details of these routes were given in our last Annual Report.

On the 23rd May, 1929, further Provisional Regulations\* were made prescribing the routes to be followed by traffic in Orange Street, Dean Street and Wardour Street, Westminster, and in the vicinity of the Hendon Central Station. These routes were also described in our last Annual Report. These further regulations, in addition, prescribed the routes referred to in the following paragraphs :—

*Knightsbridge and Brompton Road.*—The traffic arrangements existing at this junction were put into operation on the 14th February, 1927, and are illustrated in our Second Annual Report. Confirmation by Regulation was, however, deferred until the 23rd May, 1929, pending a review of the effects of the revised working, the rounding-off of corners and the erection of signs. All interested parties have concurred in the view that the re-arrangement of traffic at this junction has had a beneficial result in facilitating the flow of vehicular traffic, and in minimising the risk of accident.

*Deanery Street and Tilney Street, Westminster.*—Deanery Street is part of an important north and south route for light traffic between Hyde Park Corner, Stanhope Gate, South Audley Street and Oxford Street. There was formerly a notice at the junction of Deanery Street and South Audley Street, requesting drivers not to use the former in a southward direction except for the purpose of setting down. The Regulations made during the year have the effect of restricting Tilney Street to east-bound traffic and of keeping south-bound traffic out of Deanery Street.

*Maiden Lane.*—Under the Regulations vehicles are required to pass through Maiden Lane from east to west in conformity with the scheme of traffic control adopted in Covent Garden Market. Under the old arrangements confusion often arose, vehicles could not pass each other at the Bedford Street end of Maiden Lane, where the carriageway is only 8 ft. wide, and, as it became essential that traffic in the vicinity of Covent Garden should be diverted away from the Market, we recommended the working now in operation.

*Goodmayes Lane junction with Green Lane, Ilford.*—Following representations by the Ilford Town Council we advised the making of Regulations whereby traffic proceeding between Green Lane and Goodmayes Lane should keep to the left of the island convenience at the junction. Our recommendation was duly approved.

*The Burroughs, Hendon.*—The route prescribed was suggested by the Commissioner of Police, who pointed out that the opening of the Barnet By-pass would throw a volume of additional traffic on the Watford By-pass, and that traffic conditions would be improved if those parts of the Watford By-pass, on the east and west sides of the islands at The Burroughs, were made "one-way" streets.

*High Street, Thames Ditton.*—We agreed with the suggestion of the Commissioner of Police that a "roundabout" system at the junction of High Street and St. Leonard's Road, Thames Ditton, would improve the traffic conditions in this locality, although the volume of traffic at the present time is comparatively light and the area rather small for a scheme of this nature. If, and when, the volume of traffic becomes heavier, it may be found necessary to remove the two horse troughs from the central fountain island to alternative sites in the vicinity.

*Revocation of Certain Provisional Regulations.*—As a result of the experience gained under actual working conditions, we considered it desirable to recom-

\* The London Traffic (Prescribed Routes) (No.2) Provisional Regulations, 1929, 23rd May, 1929

mend modifications of the experiments in operation in certain localities, as under :—

(a) *Park Avenue, Wood Green.*—A portion of Park Avenue, with Barratt Avenue, was prescribed as a “ one-way ” street by the Regulations dated 22nd November, 1928, referred to above. The results from a traffic point of view did not appear to merit a continuance of the full scheme and, at the suggestion of the Local Authority and on our advice, Regulations\* were made on the 8th March, 1929, having the effect of restoring the two-way traffic working in the portion of Park Avenue concerned. Barratt Avenue still remains as a “ one-way ” street for traffic proceeding from Park Avenue to Station Road.

(b) *Cannon Street, Queen Victoria Street, etc.*—The revised traffic working in the City of London put into operation on the 9th April, 1928, is described and illustrated in our last Annual Report. As a result of representations made to them, the City Corporation approached your predecessor with a view to this system being discontinued and on the question being referred to us we gave it prolonged consideration and finally decided to recommend that, if your predecessor wished to accede to the wishes of the Corporation, he should suggest that, whilst he was prepared to revoke the Regulations so far as the “ roundabout ” system north of Watling Street was concerned, the “ roundabout ” system south of Watling Street should be continued, at any rate for a further experimental period. This course was adopted and the traffic working north of Watling Street was abolished by Regulations† dated 9th November, 1928. We subsequently conferred with representatives of the City Corporation as to the retention of the “ roundabout ” system south of Watling Street and finally advised that the traffic advantages derived from the scheme were insufficient to justify its continuance in view of the City Corporation’s desire that it should be abandoned. We accordingly recommended that the remainder of the relevant Regulations should be rescinded. Our advice was accepted and Regulations‡ were made on the 12th December, 1928, restoring “ two-way ” traffic working south of Watling Street.

*Additional Experiments in Traffic Routeing.*—Our recommendations for revised traffic working in respect of the following localities were approved by you and confirmed by Regulations§ having effect as from the 30th September, 1929.

*Melbourne Place.*—In connection with the re-arrangement of traffic in Aldwych, described in our First Annual Report, which was put into operation on the 12th October, 1925, it was brought to our notice that drivers proceeding eastwards along Aldwych frequently turn their vehicles southwards into Melbourne Place instead of proceeding to the eastern end of Australia House before making the turn into the Strand. This practice was liable to cause collisions between vehicles leaving Melbourne Place and those proceeding eastwards along the Strand. We therefore recommended that Melbourne Place should be made a “ one-way ” street for traffic proceeding in a northerly direction only.

*Strand.*—We considered a proposal by the Commissioner of Police that the thoroughfares on either side of St. Clement Danes and St. Mary-le-Strand Churches should be declared “ one-way ” streets. We were aware that the normal practice had been for west-bound traffic to keep to the south, and east-bound traffic to the north of these churches, but in view of the fact that this procedure was not always apparent to strangers in the vicinity, some of whom caused danger to themselves and to others by proceeding against the flow of oncoming traffic, we recommended that the matter should be regularised in the manner suggested by the Commissioner.

*Eastern Avenue and Woodford-Ilford Road.*—The Essex County Council have constructed a duplicate carriageway along a considerable length of the

\* The London Traffic (Prescribed Routes) Provisional Regulations, 1929, dated 8th March, 1929.

† The London Traffic (Prescribed Routes) Amendment (No. 2) Provisional Regulations, 1928, dated 9th November, 1928.

‡ The London Traffic (Prescribed Routes) Amendment (No. 4) Provisional Regulations, 1928 dated 12th December, 1928.

§ The London Traffic (Prescribed Routes) Amendment Provisional Regulations, 1929, dated 26th September, 1929.

Eastern Avenue through Ilford, as well as along the Woodford-Ilford Road, and have laid out the junction of these arterial roads with Cranbrook Road with a large central island. It appeared to us desirable that one carriageway should be reserved for "up" and the other for "down" traffic. We recommended accordingly and also that provision should be made for the necessary number of connecting links between the two carriageways.

We also advised you to make Regulations introducing a "roundabout" system at the junction of the arterial roads with Cranbrook Road, Ilford.

*London-Portsmouth Main Road junction with the Leatherhead-Surbiton Main Road at Hook.*—We were furnished with plans showing a lay-out proposed at this junction which provided that traffic should make direct crossings or right-hand and left-hand turns. In view of the large number of vehicles passing through this junction, particularly at week-ends, we thought it desirable to provide for a "roundabout" system and several proposals for modifying the lay-out on this principle were discussed but abandoned on the ground of cost. Eventually a suitable scheme was devised and we are informed that there has been a noticeable improvement in the flow of vehicles at this junction since the introduction of the revised working.

*Other Traffic Schemes: Marlborough Gate.*—The completion of the improvement in Pall Mall in the vicinity of Marlborough House, referred to in our Third Annual Report, affords an opportunity for carrying out an experiment with a "roundabout" system of traffic working. We consider that this, together with the improvement, will add considerably to the safety and convenience of traffic. It is understood that H.M. the King has sanctioned the experiment and that the revised traffic working will shortly be introduced. The proposed system and the present arrangements are illustrated in the plans attached as Appendices I and II.

*Buckingham Gate.*—We examined suggestions that "one-way" traffic working should be introduced at Buckingham Gate and Queen Anne's Gate, St. James' Park, but after hearing the views of the Westminster City Council on the matter came to the conclusion that traffic movements in these localities could not be materially improved without the expenditure of large sums of money.

*Traffic working in London Squares.*—We considered the desirability of the introduction of "roundabout" or "one-way" systems in all squares in the central area where the local conditions are suitable. Proposals were examined in detail and we satisfied ourselves that the suggestions were practicable. On the other hand, however, we appreciate that there is no delay or congestion under the existing traffic arrangements and that many vehicles would be required to travel considerably longer distances under a "roundabout" scheme. It is also doubtful whether any advantage to public safety would be gained thereby. The conclusion we reached was that no general rule of this nature should be recommended for squares but that individual squares would, in common with other thoroughfares, be considered for revised traffic working if it appeared that such would be of definite advantage.

*Junctions on Arterial Roads.*—A number of proposals for the lay-out of junctions on new arterial and main roads was considered and we made recommendations for modifications in the lay-out of junctions which would enable the "roundabout" system to be adopted when warranted by traffic conditions. The localities reviewed and not already referred to in the paragraphs of this Report dealing with road improvements, include the following:—

New Chertsey Road junction with Kew Road.

Sutton By-pass junction with Rose Hill.

Great North Road junction with Southgate Road and Mutton Lane.

Cambridge Arterial Road junction with North Circular Road.

Watford By-pass junction with Edgware Road at Canons Park.

Watford By-pass junction with Edgware-Elstree Road at Brockley Hill.

Barnet By-pass junction with Brooklands Rise, Oakwood Road and Addison Way.

North Circular Road junction with Edgware Road.



North Circular Road junction with Chigwell Road.  
 North Circular Road junction with Chingford Road (Crooked Billet).  
 Portsmouth Road junction with Esher Station Road.

In addition to the traffic schemes referred to above, we have had several other proposals under consideration, but our investigations had either not been completed or full agreement not been secured with the Local Authorities at the conclusion of the period under review.

These schemes relate to the following localities :—

Oxford Street, Orchard Street, Portman Street and Portman Square.  
 Brick Street, Piccadilly.  
 Berkeley Square.  
 Waterloo Place (southern portion).  
 Manchester Square, W.1.  
 Cheniston Gardens, Kensington.  
 Cowcross Street, Finsbury.  
 Broom Hill Road and White Hart Road, Orpington.  
 Upper Richmond Road junction with Roehampton Lane.  
 Church Street and part of Green Street, Sunbury.  
 Gunnersbury Lane, Ealing Common.

The adoption of the traffic schemes referred to in the preceding pages involves the provision of signs and/or the marking of the carriageway and we desire to record our appreciation of the help we have continued to receive from Local Authorities in this connection.

*Stopping places for Omnibuses and Tramcars.*—Paragraph (16) of the Third Schedule provides that you may make Regulations with respect to the stopping places for omnibuses and other public conveyances. As in previous years we have continued to benefit by the assistance of the Informal Advisory Body on which the following gentlemen are now serving :—

Mr. Alf. Smith, J.P., M.P. (Chairman) (Transport and General Workers' Union).  
 Superintendent J. H. Booth (City Police).  
 Superintendent T. Claro (Metropolitan Police).  
 Mr. S. R. Geary (London County Council Tramways).  
 Mr. H. F. S. Lansdown (London General Omnibus Company).  
 Mr. J. R. Williams (Ministry of Transport).

This Body usually makes a personal inspection in company with representatives of Local Authorities and transport interests concerned, before submitting recommendations for determining stopping places. Normally, arrangements are made to put any proposed alterations into operation for an experimental period of three months, the operating interests, the Police and other Bodies affected, being notified accordingly. At the end of the experimental period the stopping places are reviewed in the light of the experience gained, consideration being given to any representations which may have come to hand in the meantime.

Since the inception of the Committee, and up to the end of the period covered by this Report, the Informal Advisory Body have conducted no fewer than 610 inspections, as a result of which, 1,147 stopping places for omnibuses and 874 tramcar stopping places have been re-arranged.

During the period under review, the omnibus and tramcar stopping places in 110 different areas were inspected, and recommendations were made affecting 232 stopping places for omnibuses and 156 for tramcars.

Some idea of the magnitude of the task to be accomplished in reviewing the omnibus and tramcar stopping places within the London Traffic Area may be gathered from the fact that there are about 360 route miles of tramways in the above-mentioned area, whilst the mileage of streets over which omnibuses operate is considerably in excess of 1,000.

The examination of stopping places has undoubtedly had beneficial results on the movement of all forms of traffic, and we again wish to place on record our deep appreciation of the vast amount of detailed work which has been so ably performed by the Informal Advisory Body.

We considered the question whether all omnibus stopping places put into force as a result of our advice should be regarded as fixed stopping places to be observed by drivers even though there were no passengers to be picked up or set



down, or whether any of such stopping places were to be regarded as merely "request" stops. After considering the views of the Informal Advisory Body, we came to the conclusion that in future all "request" stops recommended, whether for omnibuses or tramcars, should be so specified and that stopping places not so specified should be regarded as "fixed" stops. We also recommended that the Police authorities should be asked to ensure, as far as possible, that the stopping places should be strictly observed.

The revision of stopping places occasionally necessitates a minor improvement such as the rounding off of a kerb or the alteration of the position of a lamp, and we are glad to record that, in most cases, a satisfactory arrangement has been made with the Local Authority concerned.

*Traffic Signs and Notices.*—We have for some time past been much concerned with the multiplicity of signs upon standards or lamp-posts on the public highway directing vehicular and pedestrian traffic to railway stations, tramway stopping places, churches, chapels, town halls, swimming baths, post offices, libraries, etc., and applications involving the erection of some hundreds of signs have been referred to us for consideration and report. It did not appear practicable to divorce these applications from the general question of the suitability of existing signs upon the streets and we therefore endeavoured in consultation with the various interests concerned, to formulate some general principles in order to determine the types of signs which may be regarded as unobjectionable from a traffic point of view. We reached the conclusion that no objection should be raised in cases where signs are required for the direction of vehicular or pedestrian traffic using streets, but that there was substantial objection to the erection of signs wholly or mainly of advertising value.

The various signs and notices upon the public highway which have received our particular attention may be considered to come broadly within the following categories:—

- (1) Signs directing to public buildings, institutions, etc.
- (2) Signs indicating the location of travelling facilities other than those provided in the streets where the signs are erected.
- (3) Signs wholly or mainly of advertising value.

We felt that the objects in view, namely, the elimination of undesirable signs and the reduction of unnecessary signs to an irreducible minimum, as well as the establishment of uniformity, could best be achieved by formulating general principles which would be consistently enforced by all highway authorities in the London Traffic Area.

After preliminary discussion with the various interested bodies, we framed a number of proposals which we considered worthy of further exploration and these are still under consideration by the parties affected. We hope that by mutual goodwill and agreement upon this important subject, it will be possible to effect the removal of large numbers of undesirable and unnecessary signs from the public highway, and to avoid the erection of further new signs which are unsuitable or objectionable from a traffic point of view. This matter is all the more important because if the exhibition of signs in London streets remains unchecked their primary object, viz., the direction of traffic will be defeated.

*Traffic Control Signals.*—We have had under consideration the question of installing light signals for the control of traffic with the object of increasing the safety of the streets for vehicles and pedestrians, and of securing the easier and more regular flow of traffic with consequent reduction of congestion and delay. We have recommended that such signals should be tried experimentally at the junction of Baker Street and Marylebone Road, and at Albert Gate, and we understand that you are considering our recommendations.

We recognise the importance of giving the system of controlling traffic by means of electrically controlled light signals a thorough trial and as any advantages to be derived therefrom would be of greatest benefit in congested thoroughfares such as Oxford Street (as distinct from the simple road intersections referred to in the previous paragraph) we are now engaged in carefully investigating a proposal to instal a system of signals in that street. The restricted width of the thoroughfare, which is further curtailed by numerous waiting vehicles, the variation in traffic conditions at different times in every

adjacent street, and the different movements of traffic along the main thoroughfare under existing conditions, all present problems which will have to be taken into account; but we hope at no distant date to be in a position to furnish a report to you recommending that a flexible progressive system of traffic control signals should be tried experimentally in Oxford Street, with the object of co-ordinating the movement of traffic at each crossing thus enabling the traffic to flow continuously at a predetermined speed throughout this busy thoroughfare.

In this connection we would refer to the Memorandum on Traffic Control by Light Signals which was prepared in September, 1929, by the Ministry in conjunction with the Home Office and the Scottish Office, to give an indication of the considered views of those Departments as to the lines upon which any developments of traffic control by light signals should proceed. This Memorandum, which you have caused to be circulated to all the highway Authorities in Great Britain, deals with various types of signals, i.e., one, two, three or four-way, displaying three colours vertically, namely red, amber, and green, and explains the significance of these colours shown either singly or in combination. Diagrams are included showing the appropriate location of such signals at typical crossroads, and suggestions are given for the working of traffic with automatic signals, and the use of automatic signals in series.

We are of opinion that this Memorandum will prove of considerable value to highway authorities who are contemplating the erection of traffic control signals, as well as to traffic generally, since uniformity is of greatest importance to all road users. In view of the continual increase of traffic it would appear that the day is not far distant when automatic signals, if experience proves them to be satisfactory, will be in general use.

*Obstructions on the Highway.*—In connection with the re-arrangement of the stopping places of omnibuses at the junction of Euston Road with Tottenham Court Road, we gave consideration to the difficulties experienced by omnibuses in drawing up against the kerb outside the premises of Messrs. Maple and Company, Limited, on account of the presence of a number of disused lamp-posts adjacent to the kerb. Upon making inquiries into the matter we ascertained that the firm proposed to replace these lamp-posts by columns of a new design supporting Venetian masts.

The existing posts were originally erected with the consent of the Vestry of St. Pancras in 1884, on condition that three of the lamps were kept alight during the same hours as the public street lamps. For many years, however, this condition has not been complied with by the firm, nor has the Council sought to require it to be fulfilled, probably owing to the fact that adequate illumination is provided by the central lamp standards. Messrs. Maple and Company have permitted the forecourt of their premises, to a width of 5 feet 8 inches, to be used as an addition to the footpaths—thereby giving a total width of 16 feet 6 inches. We ascertained that the firm were prepared to consider a modification of their proposals, and whilst we were of the opinion that, in principle, objection should be raised to the erection upon the footpath of objects likely to constitute obstruction or occasion danger to pedestrians, vehicles or passengers on vehicles, we felt that, having regard to the consent given in 1884, and to the helpful attitude adopted by Messrs. Maple and Company in regard to the use of their forecourt, no objection should be raised to the erection of two standards, with Venetian masts, one on each side of the main entrance to the firm's premises in Tottenham Court Road, providing the existing posts in that thoroughfare and also in Euston Road were removed, and subject to special consideration being given to the following points :—

(1) The thickness and construction of the bases of the posts so as to ensure so far as practicable the safety of the public :

(2) The minimum height from the level of the footpath below which no projection or projections from the posts should be permitted; and

(3) The space to be left clear between the kerb and the posts.

We understand that Messrs. Maple and Company have agreed with the St. Pancras Borough Council to erect two standards only and to give effect to the foregoing conditions. We are of opinion that these arrangements will prove satisfactory and will obviate the traffic difficulties which have hitherto been

experienced at this point, and we desire to express our appreciation of the steps taken by the local authority and the firm to meet our recommendations.

*Conveniences.*—The problem created by the presence of conveniences in the centre of important road junctions becomes more acute as time goes on.

The difficulties are well illustrated by reference to proposals which have been submitted from time to time by the Bermondsey Metropolitan Borough Council, who are anxious to abolish the underground convenience at the junction of Tower Bridge Road and Grange Road, and submitted no less than four alternative schemes.

There is a street market on the west side of Tower Bridge Road and on both sides of Bermondsey Street which already attracts large numbers of pedestrians to the district, and a large Cinema is being constructed in Grange Road by Bermondsey Street which will add considerably to the volume of pedestrian traffic crossing the junction.

Upon examination the various proposals appeared to us, and the Commissioner of Police of the Metropolis, to be open to objection on grounds of public safety and the convenience of traffic. With a view to solving their particular difficulties the Council sent a deputation to us to discuss this matter as well as the question of substituting for the existing underground convenience an above-ground convenience near the entrance to the Rotherhithe Tunnel, at the junction of Albion Street and Lower Road.

Having regard to the efforts which have been made in many parts of London to secure the removal of conveniences which are objectionable either because they obstruct the view of drivers or because they are situate on islands in heavily trafficked roads, we expressed the opinion that from the traffic point of view the Council's proposals could not be recommended, and we have suggested that the Council should explore the possibility of erecting above-ground conveniences on sites off the highway, or alternatively, of constructing underground conveniences in such positions as may be regarded as satisfactory from a traffic point of view.

Similar difficulties arose in the Metropolitan Borough of Southwark. In consequence of our recommendations, following investigations into the traffic conditions in main thoroughfares in connection with the prevention of street accidents, the Borough Council were approached with a view to securing the removal of the conveniences in Dante Road and at the junction of Blackfriars Road with Great Charlotte Street.

These matters were still under consideration at the close of the period covered by this Report.

*Telephone Kiosks.*—Paragraph (20) of the Third Schedule empowers you to make Regulations in respect of the erection or placing or the removal of any works or objects likely to hinder the free circulation of traffic in any street or likely to occasion danger to pedestrians or vehicles. In pursuance of these provisions, the arrangements made with the Postmaster-General whereby you are consulted regarding sites for public telephone kiosks in streets within the area of the London Telephone Service, were continued. Our attention was drawn to the danger and obstruction caused by certain telephone kiosks outside that area but within the London Traffic Area and the Postmaster-General having been apprised of the matter has expressed his willingness to refer all proposals for the erection of telephone kiosks within the London Traffic Area to you for consideration from the point of view of traffic requirements. During the period covered by this Report we advised you that the sites selected by the Post Office were satisfactory in 255 cases, that in 55 cases slight alterations could be made with advantage to traffic, but that in 5 cases it was not found possible to secure suitable alternative sites. You approved our recommendations and we understand that the Post Office agreed to the slight alterations suggested and did not proceed with the erection of the kiosks upon the five sites referred to above.

We wish again to express our appreciation of the cordial and helpful manner in which the Post Office Authorities have met our criticisms which the requirements of traffic called for, and particularly to thank the Postmaster-General for providing the requisite public telephone facilities within the areas of new and reconstructed Post Office premises. Such arrangements leave the footway free for the uninterrupted flow of pedestrian traffic and obviate the erection of structures upon the highway which might otherwise prove a source of risk and danger to vehicular and pedestrian traffic.

*Omnibus Check Clocks.*—As stated in our Third Annual Report, the London General Omnibus Company agreed to consult you as to the suitability of the sites upon which it might be proposed to erect omnibus “check clocks,” and it was arranged that such proposals relating to sites within the Metropolitan Police District should be reported upon by the Commissioner of Police, while applications relating to sites outside that District but within the London Traffic Area, should be inspected by your officers. It has been found that this procedure works satisfactorily and expeditiously, and 144 sites have been reported upon during the period under review.

*Lay-out of Cross Roads, Junctions and Corners.*—We were informed that the Town Planning Institute were in consultation with the Ministry regarding a Memorandum upon the lay-out of cross roads, junctions and corners which they had in preparation.

This Memorandum has now been published, and we understand that you have caused copies to be circulated to highway authorities throughout Great Britain. We are in cordial agreement with the recommendations contained in this Memorandum.

*Road Traffic Noises and Priority of Traffic at Cross Roads.*—In consequence of numerous complaints relating to excessive noise caused by certain forms of motor vehicles, a conference of representatives of various Government Departments, Local Authorities, the Police, and motoring and other organisations, was convened by you in October, 1928, after consultation with the Secretary of State for Home Affairs, and was presided over by our Chairman. This Conference was asked to consider :—

(a) The form which Regulations could most conveniently take for the mitigation of undue and unnecessary traffic noises.

(b) The question of precedence of traffic at cross roads.

In due course, a valuable report\* was drawn up and we understand that copies thereof have been issued to all the highway authorities in Great Britain.

We desire to place on record that we concurred in the recommendations relating to :—

(a) The erection of special signs and the laying down of “white lines” on subsidiary roads to indicate to drivers that they are approaching a road junction where extra caution is required.

(b) The typical lay-outs suggested for junctions providing for a complete roundabout, a semi-roundabout, or a staggered crossing.

The erection of cautionary signs and the adoption of such lay-outs at carefully selected junctions should, in our opinion, lead to beneficial results in the movement of traffic and in the reduction of risk of accident.

*“Please Cross Here” Signs.*—Local Authorities in the London Traffic Area have continued to submit proposals for the erection of “Please Cross Here” signs at busy points within their respective areas. Among the localities which have been considered in this connection during the past year are the following :—

- Hyde Park Corner.
- New Oxford Street by Hart Street.
- Victoria Embankment by Savoy Street.
- High Street, Stoke Newington.
- Seven Sisters Road by Finsbury Park.
- Ealing Broadway.
- High Street, Epsom.

Considerable progress has been made as regards the preparation of a permanent type of sign to indicate crossing places for pedestrians, and it is hoped that it will be possible in the near future to recommend the replacement of the existing temporary notices by permanent signs of an artistic character.

We were invited to express our views on a proposal that crossing places for pedestrians might be indicated by means of a beam of white light thrown across the carriageway by a lamp erected on the footpath. We came to the conclusion, however, that such a method of indicating crossing places would not be very effective, particularly in well lighted thoroughfares.

\* Report of Conference on Road Traffic Noises and Priority of Traffic at Cross Roads. Published by H.M. Stationery Office. Price 2d. net.

*Illuminated "White Lines."*—The use of "white lines" in accordance with the principles already recommended by us, has become very general, and a suggestion was made that "white lines" might be so constructed as to be capable of being illuminated at night. We have recommended that a length of illuminated "white line" should be tried as an experiment in a busy thoroughfare in the central area, and we understand that arrangements are now being made, with the assistance of the Paddington Metropolitan Borough Council, for such a trial in Bayswater Road near the Marble Arch.

#### OTHER MATTERS.

In addition to the matters referred to above, we also advised, at your request, on the following subjects which are not specifically referred to in the various sections of the London Traffic Act.

*Private Bill Legislation.*—We considered and advised you with regard to the provisions of the following Bills so far as they relate to traffic matters within the London Traffic Area :—

(a) *London County Council (General Powers) Bill, 1929.*—Under this Bill powers were sought for the construction of certain sections of the South Circular Road and of a new length of tramway from Grove Park Station via Baring Road and the South Circular Road to connect with the existing tramway route to Woolwich. In connection with these proposals we made recommendations to ensure adequate clearance between the tramway track and the kerb in Baring Road, and also that the footpath should not be unduly restricted in width. In addition, as stated above, (p. 14) we made various recommendations concerning the lay-out of junctions on the road.

(b) *Metropolitan Railway Bill, 1929.*—This Bill contained clauses seeking power to open the surface of streets for the purpose of extensions at railway stations, and also with respect to the height and span of bridges and the width of roadways over bridges. We recommended that where the Company were acquiring property for their proposed works, they should be required to notify the London County Council and to surrender such of the land required for road widenings as might be agreed upon. We also recommended that the proposed bridges should be of a width to conform to the present or proposed width of the roads connected thereby.

(c) *Westminster City (Millbank) Improvements Bill, 1929.*—This Bill sought powers to make street improvements in connection with the development of the Millbank Estate. In view of the close proximity of the proposed improvements to the new Lambeth Bridge now in course of construction by the London County Council, it appeared to us that insufficient provision was made in the Bill for the requirements of traffic, and we recommended, therefore, that greater widths should be provided in the thoroughfares concerned. Other clauses contained provisions regarding subways to accommodate pipes and wires, and we supported the representations of the Commissioner of Police that the location of means of access to the subways should be the subject of consultation with the Minister of Transport or the Police, so that such sites could be fixed where the least obstruction would be caused to traffic.

*Temporary Level Crossing over the Sutton By-Pass.*—We were informed that it was proposed to use a temporary railway with a level crossing over the Sutton By-Pass for the delivery of the building material required for the London County Council's St. Helier Housing Estate, and particulars were given of the number and frequency of trains that might be expected to use the crossing, and of the safeguards suggested by the Council. We decided to recommend that no objection need be raised to the proposal, subject to the following conditions being observed :—

(1) That the carriageways of the main roads should be brought up to rail level in concrete at a gradient of not more than 1 in 50.

(2) That the level crossing should be protected when closed to road traffic by gates painted red and white and that these gates should not obstruct the carriageway of the roads in any way, and should not be closed across the roadway on any occasion for any period longer than is necessary to permit the passage of the train.

(3) That notices bearing the words "Caution—Level Crossing" should be erected on the nearside of the carriageways on both sides of the crossing and at a distance of about 50 yards therefrom. These notices should be illuminated at night.

(4) That no train should use the level crossing between 12 noon on Saturday and 7 a.m. on Monday, nor between the hours of 4.30 p.m. and 7 a.m. from Monday to Friday, during which times the gates should be padlocked in the "Open to road traffic" position.

(5) That during foggy weather the gates should be adequately illuminated by red lamps.

(6) That no trains should use the level crossings on days when race meetings are being held at Epsom.

The Surrey and London County Councils duly accepted these conditions.

*Alterations at Marble Arch.*—With a view to affording greater security to pedestrians and improving the appearance of the surroundings of the Arch generally, H.M. Office of Works suggested that pavements should be constructed on the site of the two roadways flanking the Arch as they are not used by vehicular traffic under the "roundabout" system.

We regarded this proposal as eminently desirable and recommended accordingly. We also suggested that the eastern end of the eastern island at Marble Arch should be reduced and the refuge removed to the centre of the widened carriageway to facilitate the flow of traffic into Hyde Park.

In order to ease the movement of traffic around the western end of the Marble Arch island we suggested a rounding off of the island kerb.

These recommendations were adopted by the authorities concerned.

*Street Names.*—In our Second Annual Report, we referred to representations made to us upon the need for improvement in the display of street names, and stated that we proposed to bring the question before representatives of local authorities. On the 14th June, 1929, members of the Committee conferred with representatives of local authorities in the London Traffic Area, when certain principles were agreed as being suitable for adoption. We endorsed these principles, which are as follows, by a formal recommendation:—

(1) Street names should be made as prominent as possible.

(a) Street name-signs should be kept clean and free from all obstruction to a clear view thereof.

(b) In many cases the signs will have to be erected independently of buildings in order to meet modern requirements.

(2) They should be placed on both sides of streets so as to be visible as far as possible to both traffic streams.

(3) It is desirable that the letters should not be less than 4 inches in height, in black on a white ground unless it is agreed that another combination of colours would be so substantially better as to justify alteration.

(4) The signs should not be more than 10 feet above the ground level wherever possible.

(5) The signs should be fixed so that no notice or advertisement is within 12 inches of them. (*Vide* Clause 13 (c) of the London County Council (General Powers) Act, 1928.)

(6) The signs should not be more than 15 feet from the street line or from the junction of streets.

(7) The signs should be placed at every street junction and should be repeated where necessary.

(8) Important junctions and cross roads should have specially illuminated signs.

(9) In the case of a street passing through more than one district the name of the district should be added in smaller letters, e.g., LONDON ROAD, Mitcham; LONDON ROAD, Croydon.

(10) Road Classification and route indications, if given on or placed near street name-signs, should be of different type in order to avoid confusion.

(11) Where possible, street names should be exhibited in conjunction with street lamps so that they may be illuminated at night.

We recommended that these principles should be set out in a circular letter to all the Local Authorities in the London Traffic Area concerned in the question.

*Petrol Filling Stations.*—Representations were brought to our notice from various Local Authorities that the sites proposed for the erection of petrol filling stations and garages in busy thoroughfares or at important road junctions seemed, in some cases, to be unsuitable from a traffic point of view. It appeared to us that the matter was of some importance, as in our view it is essential that such stations should be provided with adequate entrances and exits and sufficient space off the highway for waiting vehicles. We, therefore, recommended that the erection of such stations at or near road junctions should be discouraged, and that the question of seeking additional powers to deal with the matter should be explored. We understand that the Metropolitan Boroughs' Standing Joint Committee have expressed the view that persons desirous of establishing filling stations or garages in the Metropolitan Area should be required to obtain the consent of the local highway authority, irrespective of any necessary consents from the County Council under the London Building Acts and Petroleum Acts, and that they have recommended that this requirement should be enforced by legislation.

*Football Matches.*—During this period, we again secured the assistance of the Football Association in regard to traffic difficulties likely to arise by reason of important matches being held at the same time on grounds in close proximity to one another. Through the means of the Association we were able to secure an alteration in the times of starting so as to reduce the congestion of traffic to a minimum.

*New Type of Tramway Car.*—We inspected a new type of tramcar proposed for use on the Metropolitan Electric Tramways. The principal new feature is the provision of standing platforms for passengers, with separate entrance and exit doors at each end. It appeared to us that the car was generally satisfactory and we recommended that the question of the permanent use of this type of vehicle should be further considered after experience had been gained of its utility under actual working conditions.

In conclusion, we desire to place on record our appreciation of the zealous and efficient services rendered to the Committee by the late Secretary, Mr. J. S. Pool Godsell and his successor, Mr. E. B. Hart, Mr. H. E. Aldington the head of our engineering staff, and the other officers of your Department whose services have been placed at our disposal.

Signed on behalf of the Committee,

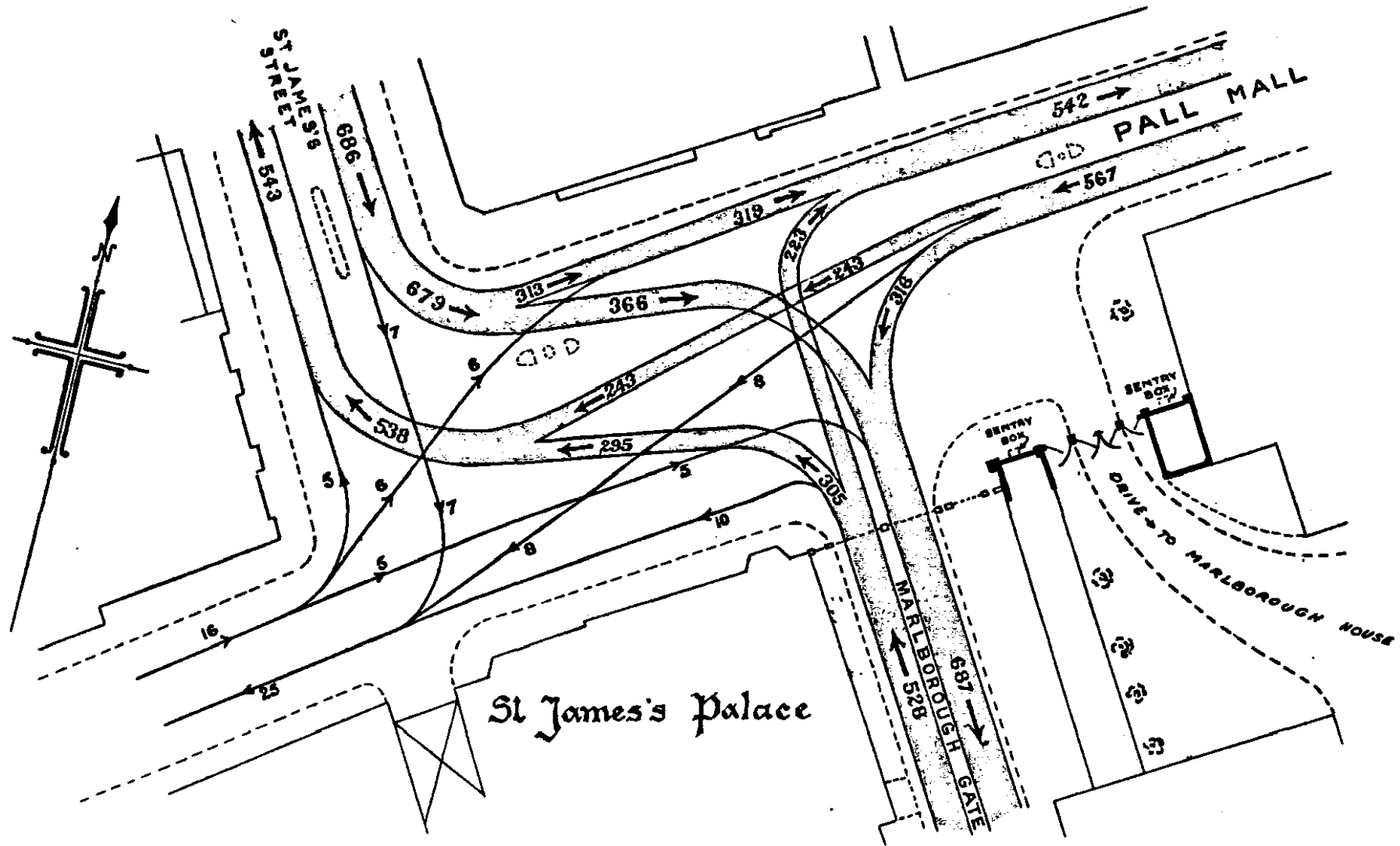
HENRY P. MAYBURY,  
Chairman.

E. B. HART,  
*Secretary.*

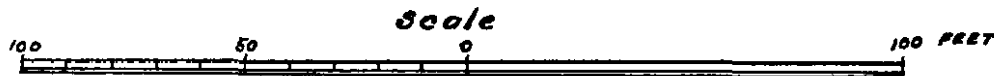
1070 5th Ave New York, N.Y.

# MARLBOROUGH GATE

## EXISTING TRAFFIC.



Figures shew number of vehicles per hour at time of traffic census.

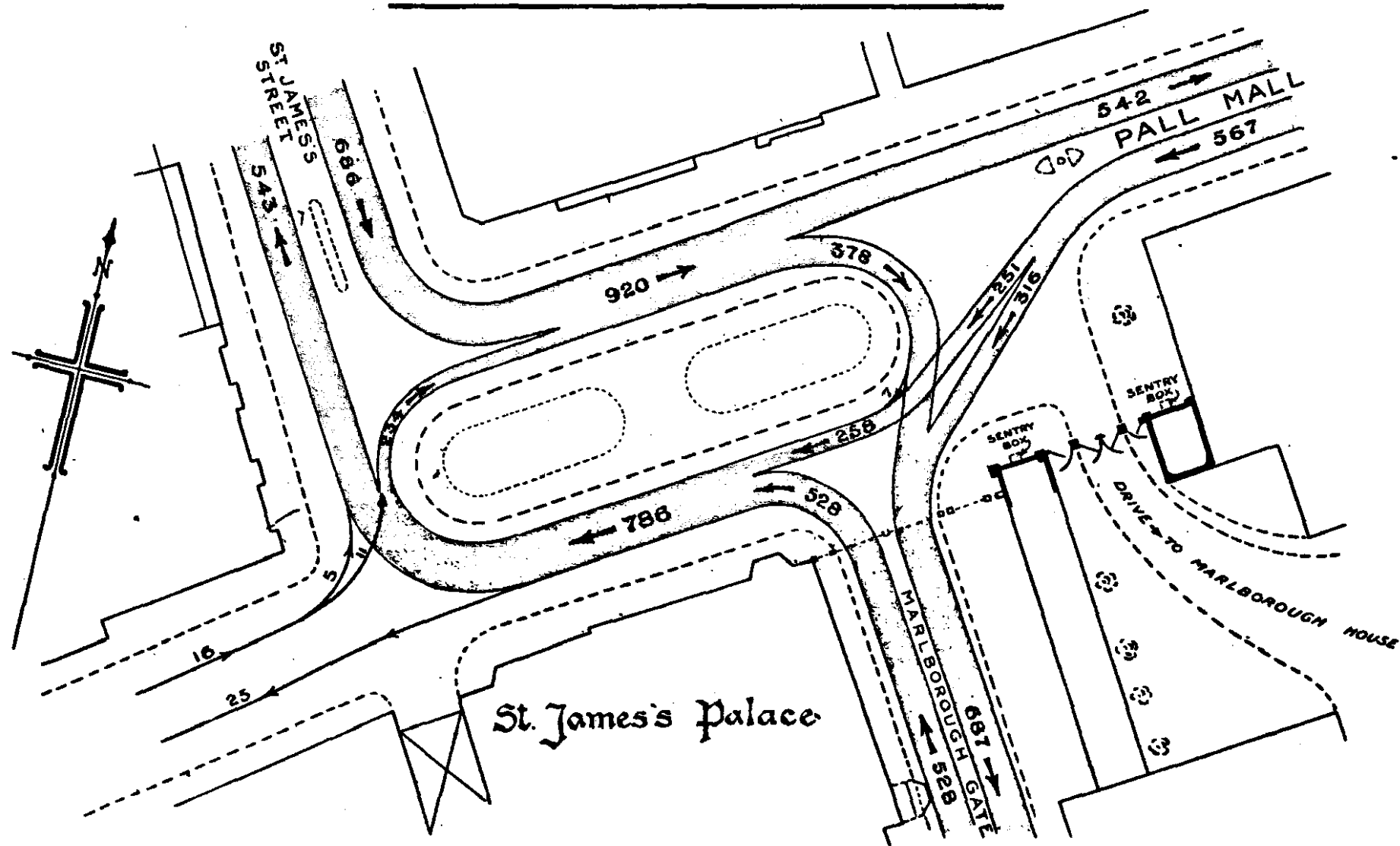


APPENDIX I.



# MARLBOROUGH GATE

## NEW ARRANGEMENT OF TRAFFIC.

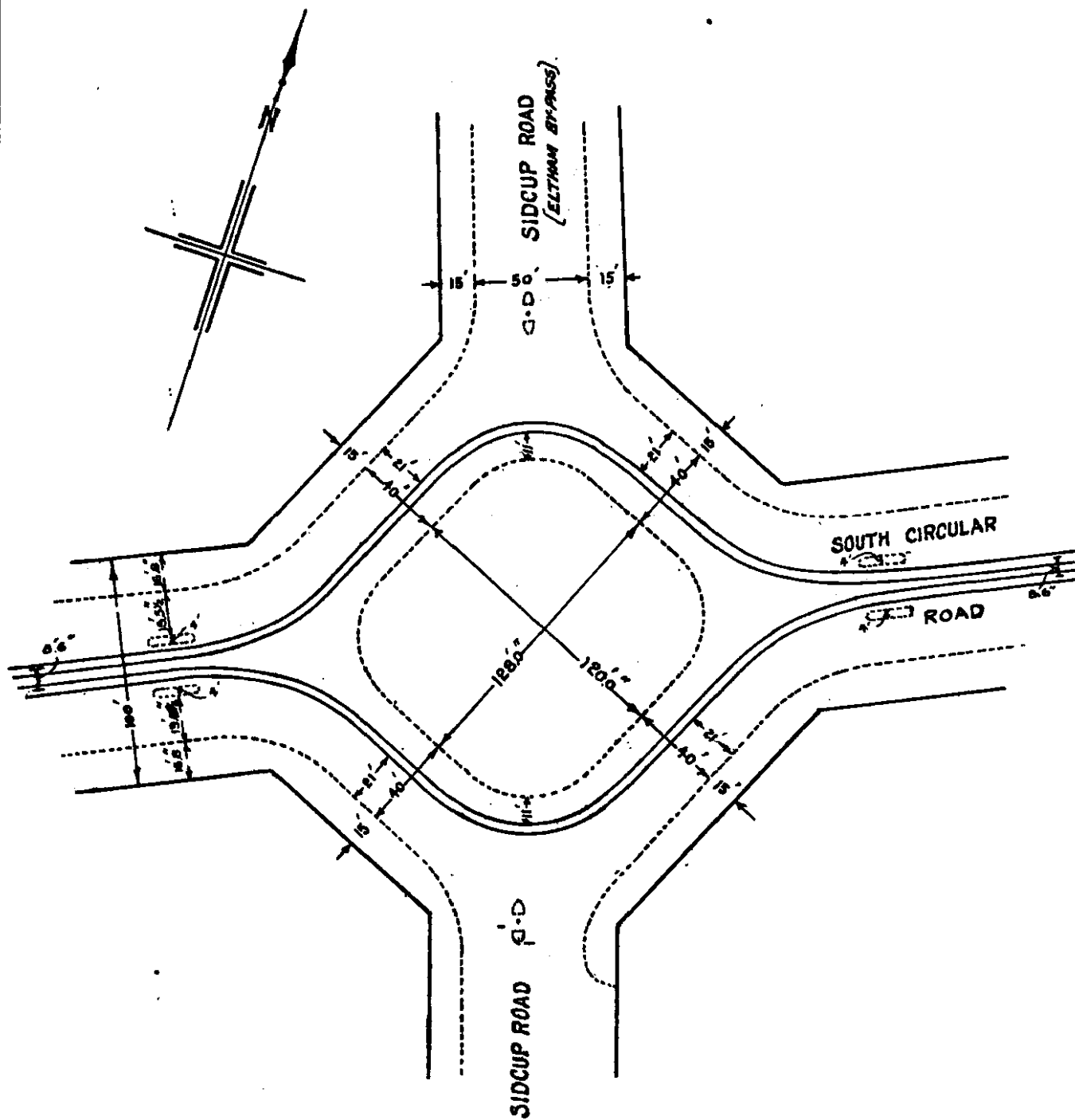


Figures show number of vehicles per hour at time of traffic census.



APPENDIX III

REVISED LAYOUT PROPOSED FOR  
JUNCTION OF SIDCUP ROAD WITH  
SOUTH CIRCULAR ROAD



**Omnibus Statistics—Year 1928.**

Statistics for the year 1928 have been compiled in respect of the omnibuses operated on approved routes situated wholly or partly within a radius of ten miles from Charing Cross.

At the 31st December, 1928, the proprietors operating omnibuses within this area were as under : —

*London General Omnibus Company, Limited, and Associated Companies.*

London General Omnibus Company, Limited (including Tramways (M.E.T.) Omnibus Company, Limited).  
Tilling and British Automobile Traction, Limited.  
Thos. Tilling, Limited.

*Companies controlled by the London General Omnibus Company, Limited.*

London Public Omnibus Company, Limited.  
Overground, Limited.

*Other Companies in which the London General Omnibus Company, Limited, have a financial interest.*

East Surrey Traction Company, Limited.  
National Omnibus and Transport Company, Limited.

*Other Proprietors.*

Sixty.

*Total—67.*

At the 31st December, 1927, fifty-seven companies were controlled by the London General Omnibus Company, Limited (see page 58 of the Third Annual Report of the London and Home Counties Traffic Advisory Committee), but on the 1st January, 1928, fifty-two of these companies were absorbed either by the London General Omnibus Company, Limited, or by the Tramways (M.E.T.) Omnibus Company, Limited. The names of the five controlled companies outside this scheme of amalgamation were :—

Cambrian Coaching and Goods Transport Limited.  
Dangerfield Limited.  
Northern Omnibus Company, Limited.  
Nulli Secundus Omnibus Company, Limited.  
Overground Limited.

Three of these companies, however, viz. : Dangerfield Limited, Northern Omnibus Company, Limited, and Nulli Secundus Omnibus Company, Limited, lost their identity on the 1st January, 1928, in that of Overground Limited; while the Cambrian Coaching and Goods Transport Limited was absorbed by the London General Omnibus Company, Limited, on the 1st May, 1928.

From the 1st January, 1928, also, the omnibuses previously operated in the name of the South Metropolitan Electric Tramways and Lighting Company, Limited, were worked in the name of the Tramways (M.E.T.) Omnibus Company, Limited, and those previously worked in the name of Messrs. Timpson's Omnibus Services, Limited, were absorbed in the fleet of Messrs. Thos. Tilling, Limited.

During the year the London Public Omnibus Company, Limited, acquired the businesses of a further eight independent omnibus proprietors, including that of the Red Rose Motor Services, Limited, which Company had previously absorbed the businesses of the Allber Omnibus Company, Limited, and John Hough Limited. The names of the eight undertakings referred to above are as follows :—

Fieldmarshal Omnibus Company, Limited.  
Forno, M.A.G.S.  
H.L. Omnibus Company, Limited.  
Julius and Lockwood.  
New Times Motor Omnibus Company, Limited.  
Nunn, F.J.  
Red Rosé Motor Services, Limited.  
Sear Bros., Limited.

In the early part of 1928 the London General Omnibus Company, Limited, acquired control of the London Public Omnibus Company, Limited, and the figures for February, 1928, and subsequent months in respect of Companies controlled by the London General Omnibus Company, Limited, include those relative to the London Public Omnibus Company, Limited.

Three small omnibus businesses were acquired during the year 1928 by other omnibus undertakings operated independently of the London General Omnibus Company, Limited, and its associated companies. The number so acquired during the previous year was six.

The summary table on the opposite page shows that the total number of passenger journeys during the year was 1,916,980,623, equivalent to a daily average of 5,237,652, an increase compared with 1927 of 190,356 passenger journeys daily or 3.77 per cent.

Of the total number of passengers, 81.43 per cent. were carried in omnibuses operated by the London General Omnibus Company, Limited (including Tramways (M.E.T.) Omnibus Company, Limited); 8.03 per cent. in omnibuses operated by companies associated with the London General Omnibus Company, Limited; 5.29 per cent. in omnibuses operated by companies controlled by the London General Omnibus Company, Limited; 0.49 per cent. in omnibuses operated by other companies in which the London General Omnibus Company, Limited, have a financial interest; and 4.76 per cent. in omnibuses operated by other proprietors. Of the total number of passengers in 1927, the percentage carried in omnibuses operated by "other proprietors" was 9.18.

The daily average number of passenger journeys was highest during the month of June (5,493,817) and lowest during the month of January (5,005,777).

The average receipt per single journey ticket issued was 1.75d., and of the total number of single journey tickets issued, 1,096,128,302, or 58.10 per cent., consisted of penny tickets, and 447,418,401, or 23.72 per cent., of twopenny tickets. The corresponding percentages for 1927 were 57.87 and 23.84 respectively. The number of return tickets (15,253,960) issued showed an increase compared with 1927 of 1,274,497, or 9.12 per cent.

During the year 216,212,627 omnibus miles were worked, and the number of omnibus hours (calculated on the scheduled time of journey) is estimated to have been 23,135,012. These figures indicate an average speed of omnibus movement of 9.25 miles per hour on weekdays and 9.97 miles per hour on Sundays, compared with 9.20 and 9.89 miles per hour respectively during the year 1927.

The average seating capacity of the omnibuses in service increased from 48.82 in 1927 to 49.14 in 1928.

A summary of the statistics for the four years 1925 to 1928 inclusive is given below:—

	Year.			
	1925.	1926.*	1927.	1928.
Number of passenger journeys...	1,687,112,834	1,699,736,878	1,842,263,169	1,916,980,623
Daily average number of passenger journeys.	4,622,227	4,870,306	5,047,296	5,237,652
Number of omnibus miles worked.	201,062,513	193,436,439	209,183,693	216,212,627
Average receipt per omnibus mile.	15.26d.	15.91d.	15.58d.	15.70d.
Average receipt per passenger journey.	1.82d.	1.81d.	1.77d.	1.77d.
Average seating capacity of omnibuses in service.	47.89	48.16	48.82	49.14
Average speed of omnibus movement (miles per hour):				
Weekdays ... ..	9.14	9.18	9.20	9.25
Sundays ... ..	9.75	9.77	9.89	9.97

\* Excluding May 1st to 16th inclusive.

**OMNIBUSES OPERATED ON APPROVED ROUTES SITUATED WHOLLY OR PARTLY WITHIN A RADIUS OF TEN MILES FROM CHARING CROSS.  
YEAR 1928.**

	Unit.	January.		February.		March.		April.		May.		June.		July.		August.		September.		October.		November.		December.		12 months ended December, 1928.	
		Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.	Week-days.	Sun-days.
		26	5	25	4	27	4	24	6 (a)	27	4	26	4	26	5	27	4	25	5	27	4	26	4	25	6 (b)	31	55 (c)
Number of proprietors ...	No.	78		75		72		69		67		67		67		67		68		67		67		67		—	
Number of passenger journeys...	No.	155,179,075		148,494,701		161,697,523		154,026,816		168,124,579		164,814,495		169,432,841		157,148,398		160,064,795		165,931,884		155,744,571		156,320,945		1,916,930,623	
Percentage of passengers carried by:—																											
L.G.O.C., Ltd. ...	%	81.39		81.56		81.63		81.65		82.21		81.76		81.41		81.09		81.13		81.36		81.15		80.76		81.43	
Companies associated with the L.G.O.C., Ltd.	%	8.12		8.04		8.05		7.95		7.91		7.95		8.07		8.13		8.07		8.01		8.09		8.06		8.03	
Companies controlled by the L.G.O.C., Ltd.	%	1.26		5.53		5.66		5.53		5.11		5.51		5.69		5.76		5.79		5.80		5.81		5.92		5.29	
Other Companies in which the L.G.O.C., Ltd., have a financial interest.	%	0.44		0.46		0.45		0.50		0.49		0.51		0.52		0.55		0.53		0.46		0.46		0.47		0.49	
Other proprietors ...	%	8.79		4.41		4.21		4.37		4.28		4.27		4.31		4.47		4.48		4.37		4.49		4.79		4.76	
Daily average number of passenger journeys.	No.	5,005,777		5,120,507		5,216,049		5,134,227		5,423,374		5,493,817		5,465,576		5,069,303		5,335,493		5,352,641		5,191,486		5,042,611		5,237,652	
Number of omnibus miles worked	Mls.	17,751,325		16,807,606		17,966,244		17,679,594		18,585,989		18,110,258		18,693,161		18,840,490		18,150,350		18,431,547		17,593,594		17,602,469		216,212,627	
Estimated number of omnibus hours.	Hrs.	1,910,357		1,810,279		1,956,180		1,886,204		1,984,587		1,937,199		1,997,708		2,011,842		1,938,891		1,969,931		1,879,900		1,871,934		23,135,012	
Average speed of omnibus movement:—																											
Weekdays ...	m.p.h.	9.21		9.21		9.21		9.22		9.26		9.26		9.25		9.26		9.25		9.26		9.29		9.30		9.25	
Sundays ...	m.p.h.	9.89		9.88		9.91		9.95		10.00		10.00		10.00		10.00		9.98		9.99		9.99		9.97		9.97	
Average seating capacity of omnibuses in service.	No.	49.18		49.17		49.16		49.20		49.12		49.13		49.15		49.08		49.10		49.16		49.18		49.12		49.14	
Receipts from tickets issued ...	£	1,093,638		1,053,273		1,166,485		1,162,154		1,277,808		1,239,115		1,306,950		1,224,713		1,219,393		1,197,474		1,105,402		1,110,144		14,145,889	
Average receipt:—																											
per passenger journey ...	d.	1.69		1.70		1.72		1.81		1.82		1.80		1.85		1.87		1.83		1.73		1.70		1.70		1.77	
per single journey ticket issued	d.	1.67		1.68		1.69		1.79		1.80		1.78		1.83		1.85		1.81		1.71		1.68		1.68		1.75	
per return journey ticket issued	d.	6.10		6.11		6.12		6.13		6.12		6.12		6.14		6.14		6.12		6.10		6.08		6.08		6.11	
Average receipt per omnibus mile	d.	14.79		15.04		15.45		15.78		16.50		16.42		16.77		15.60		16.12		15.59		15.08		15.14		15.70	
Average receipt per seat mile ...	d.	0.30		0.31		0.31		0.32		0.34		0.33		0.34		0.32		0.33		0.32		0.31		0.31		0.32	

**ANALYSIS OF TICKETS ISSUED DURING THE YEAR.  
Single Journey Tickets.**

1d.		1½d.		2d.		3d.		4d.		5d.		6d.		Other denominations.		Total.	
No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
1,096,128,302	53.10	27,817,664	1.48	447,418,401	23.72	163,905,975	8.69	71,962,918	3.82	34,004,237	1.80	20,159,909	1.07	25,101,405	1.32	1,886,498,811	100.00

**Return Journey Tickets.**

5d.		6d.		8d.		Other denominations.		Total.	
No.	%	No.	%	No.	%	No.	%	No.	%
4,808,606	31.52	6,750,537	44.26	3,305,851	21.67	888,966	2.55	15,253,960	100.00

(a) Includes Good Friday.

(b) Includes Christmas Day.

(c) Includes Good Friday and Christmas Day.

### LOADINGS OF OMNIBUSES AND TRAMCARS.

The number of passengers conveyed on the omnibuses and tramcars departing from selected loading points was taken on certain days during the months of January, March and September, 1928.

The figures were compiled on an hourly basis, and the percentage of seating accommodation occupied on departure of the omnibuses and tramcars was calculated.

This information was obtained in respect of omnibuses and tramcars operated between the undermentioned points:—

Tramway Terminus Waltham Cross and Shoreditch Church—Tuesday and Wednesday, 24th and 25th January.

“ Maypole Inn ” Chigwell Row and Ley Street Ilford—Tuesday and Wednesday, 6th and 7th March. (Tramcars are not operated between these points.)

Southend Village Catford and Kennington Gate, via Lewisham, New Cross and Peckham;

Catford (St. Laurence Church) and “ Elephant and Castle,” via Forest Hill and Dulwich; and

Junction of Stanstead Road with Brockley Rise, and Lewisham High Road (cross road via Shardeloes Road and Malpas Road northward and southward respectively)—Tuesday and Wednesday, 18th and 19th September.

Average figures have been prepared in respect of all the selected loading points on each route in both directions, and the summary statement on the opposite page shows the maximum, minimum and average percentages of seating accommodation occupied on departure of the omnibuses and tramcars from the points of enumeration.

Similar particulars to those in respect of the loadings taken in September, 1928, were available for September, 1926, and this information has been incorporated in the summary statement.

STATEMENT SHOWING IN RESPECT OF CERTAIN SERVICES OF OMNIBUSES AND TRAMCARS THE PERCENTAGE OF SEATING ACCOMMODATION OCCUPIED ON DEPARTURE FROM SELECTED LOADING POINTS (BETWEEN THE HOURS OF 6 A.M. AND 12 MIDNIGHT) ON THE UNDERMENTIONED ROUTES.

	TRAMWAY TERMINUS WALTHAM CROSS AND SHOREDITCH CHURCH.		"MAYPOLE INN" CHIGWELL ROW AND LEY STREET ILFORD.		SOUTHEND VILLAGE CATFORD and KENNINGTON GATE via Lewisham, New Cross and Peckham, CATFORD (St. LAURENCE CHURCH) and "ELEPHANT and CASTLE" via Forest Hill and Dulwich, and JUNCTION of STANSTEAD ROAD with BROCKLEY RISE, and LEWISHAM HIGH ROAD (cross road via Shardelose Road and Malpas Road northward and southward respectively).			
Dates on which census was taken.	January 24th and 25th, 1928.		March 6th and 7th, 1928.		September 18th and 19th, 1928.		September 14th and 15th, 1928.	
Direction	South.	North.	South.	North.	North-West.	South-East.	North-West.	South-East.
Number of loading points.	11	11	6	5	9	11	9	11
Percentage of Seating Accommodation occupied on Departure:—								
<i>Omnibuses—</i>								
Maximum ... ..	74.49 (8-9 a.m.)	75.02 (6-7 p.m.)	32.69 (8-9 a.m.)	34.51 (5-6 p.m.)	71.68 (8-9 a.m.)	80.78 (6-7 p.m.)	89.38 (8-9 a.m.)	80.88 (6-7 p.m.)
Minimum ... ..	18.71 (9-10 p.m.)	9.33 (6-7 a.m.)	4.10 (11 p.m.—12 midnight)	8.49 (6-7 a.m.)	11.69 (6-7 a.m.)	6.48 (8-7 a.m.)	10.58 (6-7 a.m.)	13.52 (6-7 a.m.)
Average ... ..	31.09	34.71	15.60	17.58	39.02	45.05	38.52	44.15
<i>Tramcars—</i>								
Maximum ... ..	69.10 (7-8 a.m.)	68.40 (6-7 p.m.)	—	—	57.48 (7-8 a.m.)	69.22 (6-7 p.m.)	47.63 (7-8 a.m.)	67.05 (6-7 p.m.)
Minimum ... ..	8.65 (9-10 p.m.)	6.70 (9-10 a.m.)	—	—	16.13 (9-10 p.m.)	10.60 (9-10 a.m.)	14.08 (4-5 p.m.)	9.38 (9-10 a.m.)
Average ... ..	20.52	22.54	—	—	26.53	30.56	24.73	30.33
<i>Omnibuses and Tramcars—</i>								
Maximum ... ..	63.68 (7-8 a.m.)	67.78 (6-7 p.m.)	32.69 (8-9 a.m.)	34.51 (5-6 p.m.)	57.04 (8-9 a.m.)	73.85 (6-7 p.m.)	52.31 (8-9 a.m.)	72.37 (6-7 p.m.)
Minimum ... ..	13.56 (9-10 p.m.)	9.72 (10-11 a.m.)	4.10 (11 p.m.—12 midnight)	8.49 (6-7 a.m.)	21.35 (11 p.m.—12 midnight)	12.57 (9 10 a.m.)	20.21 (11 p.m.—12 midnight)	11.81 (9-10 a.m.)
Average ... ..	24.76	27.20	15.60	17.58	31.20	35.96	29.90	35.80

The figures are average figures for all the selected loading points from which omnibuses or tramcars departed in the directions indicated.

### TRAMWAY STATISTICS.

The statement † given below in respect of tramways and light railways in the London Traffic Area shows that the total number of passengers carried during the year 1928-29 was 1,049,337,569. This is equivalent to a daily average of 2,873,484, compared with 2,783,454 during the year 1927-28, an increase of 90,030 or 3.23 per cent. The average receipt per passenger journey was 1.44d. in 1928-29 and 1.43d. in 1927-28.

A summary of the figures in respect of the number of passengers carried during the four years 1925-26 to 1928-29, inclusive, is given on the opposite page.

STATEMENT SHOWING THE RESULT OF OPERATION OF TRAMWAYS AND LIGHT RAILWAYS IN THE LONDON TRAFFIC AREA FOR THE YEAR ENDED 31st MARCH, 1929, IN THE CASE OF LOCAL AUTHORITIES, AND 31st DECEMBER, 1928, IN THE CASE OF COMPANIES.

Name of Undertaking.	Passengers carried.*	Car Miles run.*	Car Hours worked.*	Average Speed of Car movement.	Average Seating Capacity per Car in Stock.	Passenger Receipts.	Average		
							Receipt per passenger journey.	Traffic Income	
							Per Car Mile.	Per Route Mile.	
<b>LOCAL AUTHORITIES.</b>									
†Barking U.D.C. ...	485,308	49,239	8,579	Miles per hour. 5.74	56.00	£ 2,915	d. 1.44	d. 14.21	—
Bexley Tramways & Dartford Light Railways Joint Committee.	8,053,795 <i>6,890,013</i>	849,632 <i>724,640</i>	105,060 <i>89,810</i>	8.09	56.12	£ 62,912	d. 1.87	d. 18.22	£ 5,346
Croydon Corporation ...	17,172,578 <i>19,570,164</i>	1,935,302 <i>2,283,608</i>	198,370 <i>238,945</i>	9.56	62.49	£ 112,598	d. 1.38	d. 12.75	£ 18,070
East Ham Corporation ...	21,804,654 <i>23,022,317</i>	1,992,334 <i>2,032,427</i>	211,946 <i>223,187</i>	9.83	61.82	£ 113,680	d. 1.19	d. 13.34	£ 18,874
Erith U.D.C. ...	5,371,644	403,397	51,482	7.93	56.58	£ 25,987	d. 1.16	d. 15.27	£ 4,795
Ilford Corporation ...	15,880,953	1,111,686	135,406	8.21	62.26	£ 76,667	d. 1.16	d. 16.59	£ 10,748
London County Council ...	713,035,141 <i>708,073,081</i>	70,658,768 <i>70,064,582</i>	7,502,309 <i>7,433,462</i>	9.43	71.15	£ 4,288,567	d. 1.45	d. 14.62	£ 25,671
Walthamstow U.D.C. ...	23,687,260 <i>22,955,539</i>	1,917,820 <i>1,914,813</i>	222,158 <i>222,153</i>	8.62	56.50	£ 117,330	d. 1.23	d. 13.00	£ 11,617
West Ham Corporation ...	55,066,664 <i>60,018,223</i>	4,591,148 <i>4,851,454</i>	508,664 <i>535,581</i>	9.06	63.20	£ 290,811	d. 1.16	d. 15.21	£ 18,804
<b>Total, Local Authorities</b>	<b>860,557,992</b>	<b>83,514,326</b>	<b>8,943,974</b>	<b>9.34</b>	<b>69.29</b>	<b>£ 5,091,467</b>	<b>d. 1.42</b>	<b>d. 14.60</b>	<b>£ 21,784</b>
Daily average No. of passengers carried by Local Authorities.	2,357,693								
<b>COMPANIES.</b>									
London United ...	68,193,967 <i>68,424,601</i>	6,588,979 <i>6,666,863</i>	689,362 <i>697,739</i>	9.55	68.49	£ 447,422	d. 1.57	d. 16.32	£ 9,883
Metropolitan Electric ...	107,605,629 <i>110,589,733</i>	12,147,250 <i>12,021,593</i>	1,203,341 <i>1,170,889</i>	10.27	68.88	£ 679,738	d. 1.48	d. 13.56	£ 12,708
South Metropolitan ...	12,979,981 <i>13,853,010</i>	1,309,811 <i>1,445,508</i>	145,080 <i>153,060</i>	9.44	55.48	£ 86,487	d. 1.50	d. 15.73	£ 7,242
<b>Total, Companies</b>	<b>188,779,577</b>	<b>20,046,040</b>	<b>2,037,783</b>	<b>9.96</b>	<b>67.49</b>	<b>£ 1,213,627</b>	<b>d. 1.54</b>	<b>d. 14.63</b>	<b>£ 10,920</b>
Daily average No. of passengers carried by Companies.	515,791								
<b>GRAND TOTAL</b>	<b>1,049,337,569</b>	<b>103,560,366</b>	<b>10,981,757</b>	<b>9.45</b>	<b>68.93</b>	<b>£ 6,305,094</b>	<b>d. 1.44</b>	<b>d. 14.60</b>	<b>£ 18,221</b>
Daily average No. of passengers carried.	2,873,484								

\* In these columns the figures in Roman type represent the result of operation of the cars owned by the Undertaking, and those in *Italics* the working over the lines of the Undertaking by all cars, irrespective of ownership.

† Last day of operation 19th February, 1929.

‡ Extracted from Ministry of Transport "Returns of Street and Road Tramways and Light Railways," dated 21st January, 1930—Pages 18, 20, 22 and 30 to 35 inclusive.



NUMBER OF PASSENGERS CARRIED ON THE TRAMWAYS AND LIGHT RAILWAYS IN THE LONDON TRAFFIC AREA FOR THE YEARS ENDED 31ST MARCH, 1926, 1927, 1928 AND 1929 IN THE CASE OF LOCAL AUTHORITIES, AND 31ST DECEMBER, 1925, 1926, 1927 AND 1928 IN THE CASE OF COMPANIES.

Name of Undertaking.	Year.			
	1925-26.	1926-27.	1927-28.	1928-29.
<i>Local Authorities.</i>				
Barking U.D.C. ... ..	659,455	620,718	592,537	†485,303
Bexley Tramways & Dartford Light Railways Joint Committee ...	7,866,930 <i>6,745,105</i>	7,269,557 <i>6,210,645</i>	7,803,148 <i>6,686,241</i>	8,053,795 <i>6,890,013</i>
Croydon Corporation ... ..	18,482,514 <i>20,686,921</i>	12,007,390 <i>21,628,570</i>	9,380,831 <i>18,670,001</i>	17,172,578 <i>19,570,164</i>
East Ham Corporation ... ..	15,630,477 <i>17,670,970</i>	17,211,808 <i>18,715,586</i>	18,789,140 <i>20,803,057</i>	21,804,654 <i>23,022,317</i>
Erith U.D.C. ... ..	5,455,481	5,234,390	5,335,755	5,371,644
Ilford Corporation ... ..	14,169,251	14,647,033	15,829,480	15,880,953
London County Council ... ..	691,472,969 <i>684,790,232</i>	678,422,989 <i>657,053,161</i>	714,175,261 <i>701,528,060</i>	713,035,141 <i>708,073,081</i>
Walthamstow U.D.C. ... ..	17,355,560 <i>16,315,745</i>	16,806,244 <i>20,832,934</i>	20,993,556 <i>22,113,779</i>	23,687,260 <i>22,955,539</i>
West Ham Corporation ... ..	45,481,444 <i>48,146,488</i>	46,792,149 <i>48,825,513</i>	51,898,558 <i>56,877,083</i>	55,066,664 <i>60,018,223</i>
Total, Local Authorities ... ..	816,574,081	799,012,278	844,798,266	860,557,992
Daily average number of passengers carried by Local Authorities.	2,237,189	*2,257,100	2,308,192	2,357,693
<i>Companies.</i>				
London United ... ..	56,294,247 <i>56,431,792</i>	58,240,379 <i>58,719,273</i>	62,654,945 <i>63,229,345</i>	68,193,967 <i>68,424,601</i>
Metropolitan Electric ... ..	99,500,674 <i>102,815,807</i>	95,334,399 <i>99,049,454</i>	98,432,407 <i>104,357,045</i>	107,605,629 <i>110,589,733</i>
South Metropolitan ... ..	11,990,494 <i>11,123,966</i>	12,035,631 <i>11,696,731</i>	12,383,448 <i>13,213,648</i>	12,979,981 <i>13,853,010</i>
Total—Companies ... ..	167,785,415	165,610,409	173,470,800	188,779,577
Daily average number of passengers carried by Companies.	459,686	*467,800	475,262	515,791
Grand Total ... ..	984,359,496	964,622,687	1,018,269,066	1,049,337,569
Daily average number of passengers carried.	2,696,875	*2,724,900	2,783,454	2,873,484

The figures in Roman type represent the result of operation of the cars owned by the Undertaking, and those in *Italics* the working over the lines of the Undertaking by all cars, irrespective of ownership.

† Last day of operation—19th February, 1929.

\* Based on 354 days. Normal tramway services suspended during the period from 4th to 14th May, 1926, in consequence of the General Strike.

## RAILWAY STATISTICS.†

### LONDON UNDERGROUND GROUP OF RAILWAYS.

Number of passengers (including season ticket-holders estimated at 600 journeys per annum) originating on the Central London, City and South London, London Electric, Metropolitan District, Metropolitan & District Joint and Whitechapel and Bow Joint Railways during the years 1925, 1926, 1927 and 1928.

<i>Railway Company.</i>	1925.	1926.*	1927.	1928.
Central London ... ..	273,746,904	267,871,911	300,542,866	321,188,098
City and South London ... ..				
London Electric ... ..				
Metropolitan District ... ..				
Metropolitan and District Joint ...	9,629,320	8,685,287	9,215,424	9,553,473
Whitechapel and Bow Joint ... ..	5,278,238	4,878,696	5,449,647	5,698,139
Total ... ..	288,654,462	281,435,894	315,207,937	336,439,710
Daily average number of Passenger Journeys.	790,834	771,057	863,583	919,234

\* General Strike.

† Extracted from Ministry of Transport Annual "Returns of the Capital, Traffic, Receipts and Working Expenditure, etc., of the Railway Companies of Great Britain."

## STREET ACCIDENTS IN THE LONDON TRAFFIC AREA.

Section 12 (1) of the London Traffic Act confers upon the Minister certain powers of inquiry into street accidents which are alleged to be due either solely or partly to a defect in the vehicle, or the nature or character of the road or road surface.

In accordance with the arrangements made in consultation with the Home Office and the Police Authorities concerned, 463 accidents involving the deaths of 44 persons and injuries to 294 persons were reported to the Ministry during the year 1928. These accidents are relatively few in number and form a very small proportion of the total number of street accidents in Greater London.

The apparent causes of these accidents may be classified as follows:—

Cause of Accident.	Number of Accidents.	Number of persons killed.	Number of persons injured.
<b>TRAMWAY ACCIDENTS.</b>			
Defective track, including skidding ... ..	73	2	28
Mechanical or electrical defect and/or defective equipment.	37	1	56
Fire ... ..	10	—	7
Tramway standard abutting on kerb ... ..	6	—	4
Collision ... ..	21	—	8
Total ... ..	147	3	103
<b>OTHER ACCIDENTS.</b>			
<i>Due to Driver of Vehicle.</i>			
Negligent driving ... ..	11	5	7
Faulty judgment ... ..	8	—	24
Inexperienced driver ... ..	1	1	—
Total ... ..	20	6	31
<i>Due to Mechanical defects in Vehicle.</i>			
Faulty brakes ... ..	12	2	3
Faulty steering gear ... ..	65	2	36
Failure of springs... ..	5	—	5
Failure of axles ... ..	32	—	16
Burst tyre ... ..	1	—	1
Fire ... ..	1	—	1
Defective trailer coupling ... ..	2	—	—
Other causes ... ..	18	2	8
Total ... ..	136	6	70
<i>Due to condition of road or road surface.</i>			
Bad road surface ... ..	73	5	47
Bad reinstatement ... ..	23	—	7
Skidding ... ..	8	6	—
Dangerous corner ... ..	2	—	3
Tram stop badly sited ... ..	1	—	6
Defective street lighting ... ..	6	4	—
Other causes ... ..	32	3	12
Total ... ..	145	18	75
<i>Due to other Causes.</i>			
Pedestrians at fault ... ..	8	8	1
Causes unknown ... ..	7	3	14
Total ... ..	15	11	15
<b>GRAND TOTAL ... ..</b>	<b>463</b>	<b>44</b>	<b>294</b>

No formal inquiries were made into any of the above accidents but each case was investigated where it appeared that steps might be taken to obviate the occurrence of similar accidents. Accidents affecting tramways were brought to the notice of the owners of the undertaking concerned and in cases where it was apparent that the road surface was at fault due to bad state of repair, to bad reinstatement of the road surface after the completion of excavation work, or to the slippery nature of the road surface, the attention of the highway authority was drawn to the matter.

The chief causes of accidents where a defect was alleged in the vehicle concerned were found to be (a) faulty steering gear, 65, (b) axle failures, 32, (c) faulty brakes, 12. The number of accidents found to have been caused by a defect in the design or construction of new types of vehicles was very small. In one instance the failure of the defective component was traced to improper heat-treatment during a process in its manufacture, and the matter was taken up with the manufacturers concerned who agreed to replace immediately the whole batch of axles involved.

Approximately one-third of the accidents investigated and found to have been due to mechanical failure involved commercial vehicles of seven years of age or over, 60 per cent. of such vehicles having been manufactured during the War period.

Badly maintained and defective carriageway surfaces accounted directly for a large number of accidents to light vehicles, such as pedal cycles, motor cycles and motor cycles with sidecars, and indirectly assisted the development of mechanical defects in all classes of road vehicles. The numbers of such accidents compared with those of the preceding two years have, however, decreased. The carriageway defects consisted mainly of potholes, ruts, depressions in the surface adjacent to electric tramway rails and metal inspection covers, and manholes which were not flush with the carriageway surface.

The failure of statutory undertakers to fill in excavations properly after laying water, gas and electricity services is still responsible for an appreciable number of street accidents, in addition to the damage caused to vehicles and their loads. The number of such accidents has decreased, but it is obvious that many of the companies or persons responsible do not exercise sufficient care in ensuring that the reinstatement is carried out and maintained in a proper manner.

A noticeable feature is the appreciable diminution in the number of investigated accidents due to skidding, which decreased from 43 for the year ending 4th June, 1925, to 8 for the year ending 31st December, 1928. This is partly attributed to the fact that on the 4th June, 1925, a Circular suggesting a means for reducing skidding by the application to road surfaces of a liquid dressing incorporating the largest possible quantities of crushed gravel or granite chip-pings was issued to highway authorities by the Ministry. The slippery nature of the road surface itself was not responsible however for every accident investigated, as a number were found to have been caused by the presence of snow, ice or frost on the road surface and the lack of precautions such as sanding, to render the road safe.

Section 12 (2) of the Act provides that where an accident resulting in the death of any person is alleged to be due to any of the causes referred to above, the coroner holding the inquest shall send to the Minister notice of the time and place of holding the inquest, and the Minister may appoint an officer to attend the inquest. Twenty-three cases were reported under this sub-section during the year, and where it appeared that a useful purpose might be served an officer of the Ministry attended the inquest.

As a result of the information obtained through these inquests, the Ministry were able to secure certain minor road improvements designed to make conditions on these roads safer for both pedestrians and vehicular traffic. In one instance where a bridge over a river was provided with only one narrow footpath for pedestrians, successful negotiations were concluded for the erection of a separate footbridge for pedestrians and for the width of the existing footpath to be added to the carriageway of the bridge.



MINISTRY OF TRANSPORT

REPORT ON  
FATAL ROAD ACCIDENTS

which occurred during the

YEAR 1933

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## MINISTRY OF TRANSPORT

### Report on Fatal Road Accidents which occurred during the Year 1933

The accompanying tables relating to the fatal accidents which occurred on roads during the year 1933 are issued in continuation of the preliminary report published in November, 1933, on fatal accidents occurring during the first six months of the year, and are based on reports made by the Commissioner of Police of the Metropolis, the Commissioner of Police of the City of London, and Chief Constables throughout Great Britain. The Minister wishes to express again his thanks for their co-operation.

The object with which the inquiry was instituted was to obtain a detailed analysis of the principal circumstances in which fatal accidents occurred on the roads.

The form of the reports was determined after consultation with a large number of representative organizations particularly interested in this subject, and with the Home Office, the Scottish Office, and representatives of the police forces.

In the present report the circumstances in which fatal road accidents occurred are analysed in greater detail than in the preliminary report, and additional information is made available. In particular, in certain tables accidents are distributed according to age groups and the division between built-up areas and areas not built-up is carried through the tables. It was found convenient to arrange the tables in this uniform way, although the significance of the arrangement is obviously less in some tables than in others.

The Chief Constables were left to distinguish between built-up areas and areas not built-up, and it will be observed that some lighted roads have been included in the non-built-up areas, and some unlighted roads in built-up areas. The effect of this arrangement upon the accident figures occurring in built-up areas and areas not built-up respectively is pointed out in the prefatory note to table A. 4.

The report is arranged in four sections each containing a number of tables:—

*Section A* contains analyses of the accidents according to their nature and the scene and the time at which they occurred, and to conditions of traffic, weather and light.

*Section B* relates to the types of vehicles involved in fatal accidents, and the age, sex and condition (physical defect, fatigue, etc.) of their drivers.

*Section C* contains detailed analyses of the classes of persons (pedestrians, cyclists, etc.) killed in road accidents; and

*Section D* deals with the causes of accidents so far as indicated in the reports.

With respect to the tables in Section D, it should be stated that the Chief Constables were invited to indicate, where possible, what in their opinion were the causes which contributed to each accident, and, where there were several contributory causes, the main cause. It will be appreciated that direct evidence as to the cause of an accident is not always available or reliable, and the attribution of causes must be viewed with many qualifying circumstances in mind, to some of which attention is called in the following notes.

Normally the reports were sent in after the Inquest had been held and after any proceedings that might be taken as a result of the accident had been completed, so that Chief Constables might be in possession of as much information as possible and be in a better position to give their own opinion as to the causes of the accident.

The number of fatal road accidents in Great Britain during the years 1930-1933 recorded in the Home Office returns was as follows:—

1930	...	...	...	...	...	...	...	7,074
1931	...	...	...	...	...	...	...	6,499
1932	...	...	...	...	...	...	...	6,487
1933	...	...	...	...	...	...	...	7,001

and the total number of persons killed in these accidents was :—

1930	...	...	...	...	...	...	...	7,305
1931	...	...	...	...	...	...	...	6,691
1932	...	...	...	...	...	...	...	6,667
1933	...	...	...	...	...	...	...	7,202

Reports have been received by the Minister of Transport in respect of 6,949 accidents involving the death of 7,141 persons. 3,073 persons died as the result of accidents in the first half of the year (12 died after the issue of the preliminary report), and 4,068 as the result of accidents in the second half of the year. In seven accidents, involving the death of seven persons, the particulars furnished are insufficient, or were received too late for classification. The tables in this report, therefore, relate to 6,942 accidents involving the death of 7,134 persons.

Accidents which occurred at any time during the year 1933 and resulted in the death of persons after the end of that year have been recorded as fatal accidents occurring in the year. Where a death occurred during the year as a result of an accident in a previous year the accident has not been included. This accounts for certain differences between the figures in these returns and other published figures.

TABLE A. 1.—ANALYSIS OF FATAL ROAD ACCIDENTS ACCORDING TO THE NATURE OF THE ACCIDENT.

The total number of accidents is made up of:—

	Number.	Per cent. of total.
Collisions between :—		
Moving vehicles	2,285	32·9
One vehicle and pedestrian	3,401	49·0
One vehicle and animal	46	0·7
Collisions with stationary objects on or at side of carriageway	524	7·6
Accidents not involving collision	530	7·6
Multiple accidents (i.e., combinations of any two or more of the above)	156	2·2
	6,942	100·0

Of the collisions between two moving vehicles, 614 were head-on collisions, 1,203 were side-on or lateral collisions, and 273 were collisions with the rear of a vehicle. The accidents not involving collision include 72 cases of vehicles overturning and the same number of pedal cyclists being thrown or falling from their cycles.

TABLE A. 2.—ANALYSIS OF FATAL ROAD ACCIDENTS ACCORDING TO THE FEATURES OF THE LOCALITY WHERE THEY OCCURRED.

In 1,493 cases (or nearly 22 per cent.) the existence of a road junction or cross road had a bearing on the accident, but of these only 77 cases occurred at junctions which were subject to control by police or traffic signals. 4,808 fatal accidents (or nearly 70 per cent. of the total) occurred on straight roads or open road bends with a good sight line. In only 14 cases was it reported that the road was excessively cambered.

Sixty per cent. of the total accidents occurred in built-up areas.

TABLE A. 3.—WIDTH OF CARRIAGEWAY AND DENSITY OF TRAFFIC.

It will be observed that 4,199 fatal accidents occurred on roads carrying only a very light traffic at the time, 2,472 on roads on which the traffic was moderate and only 224 on densely trafficked roads where of necessity speeds would be greatly reduced and drivers would be forced to proceed with caution.



In considering the incidence of accidents on roads of varying widths, it is necessary to bear in mind that the mileage of roads in the various groups will differ widely. To what extent is not known, but it will be observed that of the total number of accidents analysed

1,468 occurred on roads not exceeding 20 feet in width,

2,997 occurred on roads exceeding 20 feet but not exceeding 30 feet in width, and

2,472 occurred on roads exceeding 30 feet in width.

These were divided between built-up areas and areas not built-up as follows:—

	Built-up.	Not built-up.	Total.
On roads not exceeding 20 ft. in width ... ..	395	1,073	1,468
„ exceeding 20 but not exceeding 30 ft. in width ... ..	1,720	1,277	2,997
„ exceeding 30 ft. in width ... ..	2,029	443	2,472

TABLE A. 4.—CONDITIONS OF WEATHER AND LIGHT.

Over 85 per cent. of accidents occurred in clear weather, when visibility is stated to have been normal. This confirms the impression recorded in the preliminary report that conditions of low visibility, in which traffic itself is of course often reduced in volume, bring home to users of the highway the necessity for caution and for reducing speed.

Nearly two-thirds of the accidents occurred in daylight.

Of the 2,110 accidents during hours of darkness, 1,254 were recorded as occurring in built-up areas and 856 in areas not built-up. In built-up areas, street lighting was reported as being good in 904 cases and as being poor in 244 cases, while in 106 cases there was no street lighting or the lamps had been extinguished. In areas not built-up, street lighting was reported as being good in 136 cases and poor in 129 cases, and in 591 cases there was no street lighting.

It will be observed that some roads with street lighting have been included by the Chief Constables, for the purposes of their reports, as being in areas not built-up and that some unlighted roads have similarly been included as being in built-up areas. The result is that 105 fatal accidents on unlighted roads appear as occurring in built-up areas and 265 such accidents on lighted roads as occurring in areas not built-up. The Chief Constables were left to determine for the purposes of their reports the standard of street lighting which they have classified as “good” and “poor”.

*(Compare Tables XIV and XV in the preliminary report.)*

TABLE A. 5.—NUMBER OF FATAL ACCIDENTS WHICH OCCURRED AT EACH HOUR OF THE DAY.

From midnight through the early morning hours, when there is little traffic on the roads, the proportion of accidents is naturally low. It rises to a small peak between 7 and 9 a.m.; drops between 9 and 10 a.m.; and then increases, rising to a further peak between 12 noon and 1 p.m. Declining again, it begins to rise between 3 and 4 p.m. and reaches its highest point between 5 and 6 p.m., declines again until 10 p.m. and then rises to a further marked peak between 10 and 11 p.m. In areas not built-up the figures begin to rise earlier in the day than in the built-up areas, and mount steadily until 6 p.m.

As was to be expected, the number of accidents at the different hours of the day tends to follow the fluctuations in the total volume of traffic, both pedestrian and vehicular, and the peaks correspond with the time when people go to their work or their meals, or return home at the end of the day's work or the evening's recreation. Taking the week as a whole, the figures show that the hour between 10 and 11 p.m. is the fifth most fatal hour, but on Saturdays, Sundays and on Bank Holidays more accidents occur in that hour than in any other.

It will be observed that the total number of fatal accidents occurring between midnight and 5 a.m. was only 138, of which 65 occurred in built-up areas and 73 in areas not built-up. These 138 accidents involved the death of only 31 pedestrians, of whom 23 were killed in built-up areas, an average of less than one a fortnight.

*(Compare Table II in the preliminary report.)*

TABLE A. 6.—NUMBER OF FATAL ACCIDENTS ON EACH DAY OF THE WEEK AND IN EACH MONTH.

The average daily number of fatal accidents rose from 16·4 during the first six months, as shown in the preliminary report, to 19 for the full year.

It is found that the highest number of accidents on any day of the week occurs on Saturdays—an average of 25—while on Sundays, when there is a great decrease in the use of goods vehicles and in regular passenger traffic, as compared with other days, although there is an extensive use of pleasure vehicles, the average was lowest at 15·8. The average for Bank Holidays throughout the year was 21·7.

During the six summer months (April to September) fatal accidents averaged 20·4 a day compared with 17·6 a day during the six winter months. There was a noticeable increase in areas not built-up during the three months July to September, due no doubt to holiday traffic, the peak being reached in August; but the daily average was at its highest in built-up areas during the months September to November.

*(Compare Tables III and IV in the preliminary report.)*

TABLE B. 1.—TYPES OF VEHICLES INVOLVED IN FATAL ACCIDENTS.

The total number of vehicles involved in fatal road accidents was 9,612, made up as follows:—

Private motor vehicles ... ..	2,796
Motor cycles ... ..	1,959
Public conveyances ... ..	1,043
Motor vans, lorries, etc. ... ..	1,939
Miscellaneous mechanically-propelled vehicles ... ..	84
Pedal cycles ... ..	1,625
Horse-drawn vehicles ... ..	142
Miscellaneous vehicles ... ..	24

Except in the case of motor cycles, the number of vehicles of each class involved in accidents was greater in built-up areas than in areas not built-up.

667 of the 1,959 motor cycles involved were carrying a pillion rider at the time of the accident.

Of the 1,043 public conveyances concerned, 77 were taxi-cabs and 125 were tramcars.

Of the 1,939 motor vans and lorries concerned, about 60 per cent. were of types not exceeding 2 tons in weight unladen, and only about 25 per cent. were fitted with guard rails or running boards. 56 were drawing trailers at the time of the accident.

TABLE B. 2.—AGE, SEX AND EXPERIENCE OF DRIVERS (INCLUDING PEDAL CYCLISTS) INVOLVED IN ACCIDENTS.

As in the preliminary report, the proportion of those pedal cyclists involved in accidents who were under 18 is noticeable. They numbered 488, nearly one-third of the total. One hundred and four pedal cyclists of 61 years of age or over were involved in fatal accidents.

About 4 per cent. of the drivers involved were women. From figures taken in six representative areas it would appear that about 12 per cent. of all persons holding driving licences are women.

Out of the total of 7,821 drivers of mechanically-propelled vehicles involved in fatal accidents 346 had been licensed less than six months and 59 were inexperienced with the type of vehicle which they were driving. In the absence of information as to the total number of inexperienced drivers on the roads during the year, it is difficult to draw definite conclusions from these figures. Inexperienced motor cyclists form an unduly high proportion of the total.

It will be appreciated that for the purpose of the returns some arbitrary criterion of experience had to be adopted and that the mere fact that a licence had been held for six months is not in itself a proof of experience in driving.

*(Compare Tables IX and X in the preliminary report.)*

**TABLE B. 3.—PERSONAL CONDITION AND PHYSICAL DEFECTS OF DRIVERS OF VEHICLES (INCLUDING PEDAL CYCLISTS) INVOLVED IN FATAL ACCIDENTS.**

In very few accidents were the drivers of motor vehicles stated to have been fatigued, but it is difficult for the police to estimate the degree of fatigue of the driver who, even if he has not been injured, is not likely to be in a normal condition after being involved in a fatal accident.

Without information as to the proportion of drivers of vehicles and pedal cyclists who are blind in one eye or deaf, it is difficult to draw definite conclusions from the figures relating to those infirmities.

No driver involved in a fatal accident was stated to be colour blind.

*(Compare Table XI in the preliminary report.)*

**TABLE B. 4.—PREVIOUS CONVICTIONS OF DRIVERS.**

About 4 per cent. of all drivers concerned in fatal accidents were reported as having previous convictions for manslaughter, driving under the influence of drink or drugs, or (as in most cases) for dangerous or careless driving.

*(Compare Table XII in the preliminary report.)*

**TABLE B. 5.—ESTIMATED SPEEDS OF VEHICLES INVOLVED IN FATAL ACCIDENTS.**

Attention was drawn in the preliminary report to the difficulty of obtaining trustworthy evidence as to the speed of a vehicle immediately before an accident, and when the emergency first arose. This, rather than the speed at the moment of the collision, is the crucial factor. Usually the driver himself can only give an estimate, and he is not likely to err on the side of excess. The opinions of witnesses, if there are any, frequently conflict. The opinion recorded by the police must necessarily follow such evidence as they have, and it is often limited to the uncorroborated statement of the driver concerned. The present analysis is confined to fatal accidents and in nearly 68 per cent. of the total cases analysed, the pedestrian or pedal cyclist is dead or fatally injured and therefore unable to give his version.

Taking the figures as they stand, the table would suggest that in the 6,657 cases where an estimate of speed was given, 1,300 of the motor vehicles involved in fatal accidents were proceeding at speeds not exceeding 10 miles an hour, and 2,818 more at speeds not exceeding 20 miles an hour. Thus, if the figures were correct, nearly 62 per cent. of fatal accidents would have occurred when the vehicle involved was travelling at not more than 20 miles an hour, while even in areas which are not built-up the corresponding figure would not be far short of 50 per cent. Such a result is alone sufficient to indicate the greatest need for caution in interpreting these figures.

To turn to the figures relating to the private motor vehicle, other than a motor cycle, it will be seen that, exclusive of 227 vehicles which were stationary

or of which no estimate of speed was obtainable, 1,191 of the vehicles involved were shown as travelling at a speed not exceeding 20 miles an hour and 1,378 at a speed in excess of 20 miles an hour. In only 98 cases was the speed returned as exceeding 40 miles an hour.

**TABLE C. 1.—CLASSIFICATION OF PERSONS KILLED.**

Of the 7,134 persons killed with whom the returns deal, 3,517 (49 per cent.) were pedestrians, and of the remaining 3,617, 1,324 (18·6 per cent. of the total) were pedal cyclists and 1,308 (18·3 per cent. of the total) motor cyclists.

The number of persons driving motor vehicles (other than motor cycles) who were killed was 219 (3 per cent. of the total). Attendants and passengers, other than persons riding pillion, killed numbered 474 (6·6 per cent. of the total). Two hundred and three persons met their death while riding pillion.

Seventy-six per cent. of the pedestrians, 52 per cent. of the pedal cyclists and 39 per cent. of the motor cyclists were killed in accidents occurring in built-up areas. The percentage of all fatalities in built-up areas was 59.

Consideration of this table with Table B. 1 shows that of the 1,625 pedal cyclists and 1,959 motor cyclists involved in fatal road accidents, 1,324 (or 81 per cent.) and 1,308 (or 67 per cent.) respectively were killed.

The figures relating to motor cyclists, pedal cyclists and pedestrians are further analysed in the following tables in this section of the report.

**TABLE C. 2.—AGE OF MOTOR CYCLISTS KILLED.**

It is difficult to draw definite conclusions from these figures because the total number of motor cyclists in each age group is not ascertainable.

The figure for motor cyclists between the ages of 21 and 26 is high; possibly a large proportion of motor cyclists are between these ages.

*(Compare Table X in the preliminary report.)*

**TABLE C. 3.—AGE AND SEX OF PEDAL CYCLISTS KILLED.**

The number of pedal cyclists under 21 years of age killed in road accidents (526 out of a total of 1,324 pedal cyclists killed) is very noticeable.

Over 80 per cent. of cyclists killed were killed as a result of a collision with a mechanically-propelled vehicle.

*(Compare Tables IX and X in the preliminary report.)*

**TABLES C. 4 AND C. 5.—FATAL ACCIDENTS TO PEDAL CYCLISTS ANALYSED ACCORDING TO TRAFFIC CONDITIONS, ETC.**

In 37 per cent. of the fatal accidents to pedal cyclists the existence of a junction or cross road had a bearing on the accident. Nearly 50 per cent. occurred on straight roads or on open road bends with a good sight line.

Sixty-two per cent. of these accidents occurred in very light traffic conditions and only a very small proportion where traffic was dense.

Table C. 5 shows that 70 per cent. of the accidents in which pedal cyclists were killed occurred in daylight, and that only 13 pedal cyclists killed during the hours of dusk or darkness were not carrying red rear lights or reflectors on their cycles. Twenty cyclists were killed when carrying a second person on a solo bicycle. Two hundred and twenty-one cyclists were killed as a result of a mechanically-propelled vehicle running into the rear of the cycle. One hundred and one of these cases occurred in daylight or where street lighting was good and 11 in dusk or semi-darkness. Of the 109 cyclists run into from behind in the hours of darkness and where street lighting was poor or absent, 98 had reflectors on their bicycles, 1 had a red rear light and 5 had neither rear light nor reflector. In the remaining 5 cases it is not known whether a rear light or reflector was carried.

TABLES C. 6 AND C. 7.—AGE, SEX AND PHYSICAL CONDITION OF PEDESTRIANS KILLED.

Table C. 6 analyses the number of pedestrians killed according to age and sex and shows the number per 100,000 of the population in each age group and of either sex. Out of 3,517 pedestrians killed, 2,739 or nearly 78 per cent. were under 15 or over 55 years of age.

The figures for children under the age of five years, most of whom would normally be in charge of some older person, are less than those for the age group between five and ten years, the period during which children learn to go about without immediate supervision but lack experience. After 10 years of age experience and education lead to a rapid decrease, and liability to fatal accidents reaches its lowest point between 25 and 30 years. Thereafter the figures show an increase for each age group, which steepens rapidly after the age of 60, especially among males.

The difference in the figures for males and for females is noticeable, those for females being substantially lower in each age group than those for males.

Seventy-seven per cent. of the fatalities to children under 15 years of age and nearly 80 per cent. of the fatalities to persons over 55 years of age occurred in built-up areas; in the intermediate ages the percentage of fatalities in built-up areas was 67. About 17 per cent. of the pedestrians killed were reported as being ill or afflicted with physical defects or infirm.

(Compare Table VII in the preliminary report.)

TABLES C. 8, C. 9 AND C. 10.—FATAL ACCIDENTS TO PEDESTRIANS ANALYSED ACCORDING TO THE MOVEMENT OF THE PEDESTRIAN, TRAFFIC CONDITIONS, ETC.

The first of these three tables shows the movement of the pedestrian in the roadway immediately prior to the accident. The figures do not deal with the question of responsibility for the accidents to which they relate.

1,894 (54 per cent.) of the pedestrians were crossing the roadway when the accident occurred. Of these 891 were persons over 60 years of age.

As will be seen from the following figures, by far the greatest number of fatal accidents to pedestrians while crossing the roadway occurred when the traffic on the road was either very light or moderate:—

<i>Traffic conditions.</i>	<i>Pedestrians killed while crossing roadway.</i>
Very light ... ..	936
Moderate ... ..	848
Dense ... ..	95
Exceptional conditions ... ..	15
	1,894

503 pedestrians were killed when passing behind or in front of stationary vehicles.

Of the 1,566 pedestrians killed while crossing the roadway in a built-up area, 1,391 were crossing at points more than 50 yards from any refuge or subway.

Table C. 9 shows that in built-up areas 897 pedestrians were killed while crossing roads on which there were no tramway tracks, and 669 while crossing roads in which tramway tracks were laid.

Table C. 10 shows that 637 pedestrians, mostly children, were killed when running into the roadway. Of the 254 persons killed while walking along the roadway, 194 were walking in the same direction as the traffic and 60 were walking against the traffic. In 143 of these cases a footpath was available, and in 111 cases no footpath was available.

The Highway Code recommends pedestrians, where no footpath is available, to walk on the right of the carriageway so as to face oncoming traffic.

129 pedestrians were killed on footpaths or refuges.

(Compare Table VIII in the preliminary report.)

TABLES D. 1 TO D. 8.—CAUSES OF FATAL ROAD ACCIDENTS.

As foreshadowed in the preliminary report, the causes of fatal accidents have been further analysed and in the present report the sole or main cause and any contributory causes assigned by the Chief Constables are separately indicated. For example, where an accident is reported as having been caused mainly by the action of a pedestrian, but error on the part of the driver of the vehicle concerned is reported as having been a contributory cause, the accident has been enumerated as one of which the main cause is attributed to the pedestrian and the contributory cause to the driver.

This section of the report must be interpreted with particular caution, partly for reasons which have already been noted or are mentioned hereafter. It was realised, when the forms were drawn up, that the police would be faced with a very difficult task in attempting an attribution of causes for the fatal accidents upon which they were called upon to report. Lack of evidence, the complexity of circumstances and the fact that the returns were the first of their kind added to the difficulty of a definite and satisfactory analysis, and the results must be regarded as in many respects tentative and such as might be open to many corrections if the full facts had been ascertainable.

It will be observed that the total number of fatal road accidents (6,942) to which the report relates exceeds the total number of causes shown as being the sole or main cause of such accidents (6,275) by 667. This is due partly to the fact that in a number of cases the Chief Constables did not assign a sole or main cause to an accident, but reported only two or more contributory causes, and partly to the fact that in 196 cases the cause of the accident was not traceable. In the former case the causes given in the reports have been shown as contributory causes only.

In the tables in Section D of this report causes are analysed according to whether they are attributed to:—

- (a) a driver (other than a pedal cyclist);
- (b) a pedal cyclist;
- (c) a pedestrian;
- (d) a vehicle or its equipment;
- (e) the weather or conditions of the roadway;
- (f) passengers, etc., or animals,

or

- (g) obstructions on or at the side of the roadway.

The number of fatal accidents attributed by the Chief Constables to each of these causes is shown in the following table:—

Table.	Sole or main cause.		Contributory causes.	
	Built-up areas.	Areas not built-up.	Built-up areas.	Areas not built-up.
D. 1 Drivers ... ..	852	994	705	746
D. 2 Pedal cyclists ... ..	485	371	202	176
D. 3 Pedestrians ... ..	2,179	636	637	155
D. 4 } Vehicles or their equipment ...	106	212	97	153
& 5 }				
D. 6 { Conditions of roadway (including presence of tramway track) ...	70	73	226	226
{ Weather ... ..	28	77	97	125
D. 7 { Passengers, etc. ... ..	40	30	5	3
{ Animals ... ..	35	60	8	13
D. 8 Obstructions ... ..	6	15	18	16

(Compare Table XVII in the preliminary report.)

TABLE D. 1.—CAUSES OF ACCIDENTS ATTRIBUTED TO DRIVERS  
(EXCLUDING PEDAL CYCLISTS).

The principal causes of fatal road accidents attributed to drivers were as follows:—

	Sole or main cause.	Contributory causes.	Total.
Proceeding at excessive speed having regard to conditions ... ..	479	206	685
Failure to keep to near side of road ...	249	225	474
Apparently inattentive or attention diverted ... ..	240	142	382
Swerving ... ..	121	218	339
Skidding ... ..	161	129	290
Overtaking improperly, pulling out suddenly to overtake, or cutting in ...	169	83	252
Inexperience ... ..	94	103	197
Failing to signal, failing to signal sufficiently early, giving indistinct signal, or failing to give audible warning of approach ... ..	36	102	138
Other causes ... ..	297	243	540
	1,846	1,451	3,297

It will be seen that of the various causes attributed to drivers the most frequent is excessive speed having regard to the conditions. In 221 cases in built-up areas and in 258 cases in areas not built-up (total 479) this is given as the sole or main cause. In 99 cases in built-up areas and in 107 cases in areas not built-up (total 206) it is given as a contributory cause. In only 79 cases is it assigned as the sole or main cause of a collision with a pedestrian, and in 46 cases only as a contributory cause.

Reference has already been made in connexion with Table B. 5 to the doubts attaching to estimates of speed, and the number of cases in which excessive speed having regard to the conditions is reported as the sole or main or as a contributory cause of fatal road accidents must therefore be viewed with considerable reserve.

The next most frequent cause of accidents attributed to drivers is failure to keep to the near side of the road.

TABLE D. 2.—CAUSES OF ACCIDENTS ATTRIBUTED TO  
PEDAL CYCLISTS.

This table shows that the principal causes attributed to pedal cyclists were:—

	Sole or main cause.	Contributory causes.	Total.
Losing control ... ..	234	112	346
Swerving ... ..	126	61	187
Skidding ... ..	66	32	98
Other causes ... ..	430	173	603
	856	378	1,234

TABLE D. 3.—CAUSES OF ACCIDENTS ATTRIBUTED TO PEDESTRIANS.

The principal causes shown in this table were:—

	Sole or main cause.	Contributory causes	Total.
Running into roadway from footpath ... ..	676	69	745
Walking or running from behind vehicle without due care ... ..	495	58	553
Apparently becoming confused or hesitating in traffic	395	131	526
Apparently risking moving traffic ... ..	319	168	487
Stepping from kerb or refuge without looking ...	337	42	379
Walking or standing in roadway, or crossing roadway and apparently inattentive to traffic, or not looking in the direction of oncoming traffic ... ..	126	50	176
Playing in roadway ... ..	71	11	82
Ill, physically defective, or generally infirm ... ..	73	189	262
Other causes ... ..	323	74	397
	2,815	792	3,607

The number of cases in which a pedestrian was reported as being the sole or main cause or as being a contributory cause of a fatal accident (3,607) corresponds fairly closely with the number of pedestrians killed in road accidents. It must be remembered that in a large number of these cases the evidence of the party on whom responsibility is laid was not obtainable. In the two most frequent causes—running into the roadway and walking or running from behind a vehicle—and in the fifth most frequent cause—stepping from kerb or refuge without looking—there is evidently a presumption of carelessness on the part of the pedestrian. In the third and fourth causes—apparently risking moving traffic and apparently becoming confused or hesitating in traffic—the speed of the traffic or the manner in which vehicles were being driven may have been an element in the pedestrian's behaviour.

TABLES D. 4 AND D. 5.—CAUSES OF ACCIDENTS ATTRIBUTED TO VEHICLES OR EQUIPMENT.

The principal causes shown in these tables were:—

	Sole or main cause.	Contributory causes.	Total.
Inadequate or no front lights, inadequate or no rear lights, or dazzling head or side lights ...	116	113	229
Defective or smooth tyres... ..	45	26	71
Defective brakes ... ..	25	44	69
Failure of steering mechanism ... ..	19	6	25
Other causes ... ..	113	61	174
	318	250	568

In only 24 cases was the absence of an effective reflector or rear lamp on a pedal cycle assigned as a cause.

(Compare Table XVI in the preliminary report.)



**TABLE D. 6.—CAUSES OF ACCIDENTS ATTRIBUTED TO TRAMWAY,  
ROAD OR WEATHER CONDITIONS.**

Tramways were assigned as a cause in 39 cases.

Of the 556 cases in which various defects in the lay-out or surface of the road are assigned, in 435 they are given as merely contributory causes. The most frequently assigned causes attributed to the road are the obscuring of view by blind corners or bends or by gradients (233), road surface slippery or in bad repair (166), and the absence or poor quality of street lighting (130). In only 13 cases was excessive camber given as a cause and in only one case was a dangerous hill reported as a contributory cause of a fatal accident.

Weather conditions were reported as the sole or main cause in 105 cases and as a contributory cause in 222 cases.

**TABLES D. 7 AND D. 8.—CAUSES OF ACCIDENTS ATTRIBUTED (a) TO  
PASSENGERS, ETC., OR TO ANIMALS, AND (b) TO OBSTRUCTIONS.**

Obstructions on or at the side of the carriageway were assigned as the sole or main cause in only 21 cases and as a contributory cause in 34 cases.

Ministry of Transport.

14th May, 1934.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.1.—Statement showing the total number of accidents, analysed to indicate the nature of the accidents.

Nature of Accident.	Built-up Areas.							Areas not Built-up.							GRAND TOTAL.
	England (including Monmouthshire).				Wales.	Scotland.	Total, Great Britain.	England (including Monmouthshire).				Wales.	Scotland.	Total, Great Britain.	
	City of London.	Metropolitan Police Area.	Elsewhere.	Total.				City of London.	Metropolitan Police Area.	Elsewhere.	Total.				
Collision between moving vehicles:—															
Two vehicles:—															
Head-on collision in centre of road ...	—	22	45	67	3	2	72	—	2	86	88	5	17	110	182
Head-on collision with one vehicle on wrong side.	—	30	110	140	11	10	161	—	4	220	224	15	32	271	432
Side-on or lateral collision ...	1	178	410	589	15	24	628	—	34	457	491	29	55	575	1,203
Collision with rear of another vehicle	—	42	69	111	—	5	116	—	7	132	139	5	13	157	273
Collision other than above ...	1	19	36	56	3	6	65	—	2	23	25	—	2	27	92
Total ...	2	291	670	963	32	47	1,042	—	49	918	967	54	119	1,140	2,182
Three or more vehicles ...	—	27	29	56	—	—	56	—	5	41	46	—	1	47	103
TOTAL ...	2	318	699	1,019	32	47	1,098	—	54	959	1,013	54	120	1,187	2,285
Collision between one vehicle and pedestrian:—															
Collision with pedestrian in carriageway	12	778	1,374	2,164	79	251	2,494	—	45	634	679	42	112	833	3,327
Collision with pedestrian on footpath ...	1	14	36	51	4	7	62	—	—	7	7	—	3	10	72
Collision with pedestrian in carriageway and another pedestrian on footpath.	—	—	—	—	—	—	—	—	—	—	—	—	2	2	2
TOTAL ...	13	792	1,410	2,215	83	258	2,556	—	45	641	686	42	117	845	3,401
Collision between one vehicle and animal	—	1	3	4	1	1	6	—	3	34	37	2	1	40	46

Collision between one vehicle and obstruction (including stationary vehicle):—															
Collision with stationary vehicle in carriageway :—															
In centre of carriageway :—															
vehicle lighted ... ..	—	1	1	2	1	—	3	—	—	1	1	—	—	1	4
vehicle not lighted ; daylight ...	—	—	2	2	—	—	2	—	—	—	—	—	—	—	2
vehicle not lighted ; dark... ..	—	—	—	—	—	—	—	—	—	1	1	—	—	1	1
On near side of carriageway to the moving vehicle :—															
vehicle lighted, facing correctly (in direction of traffic).	—	8	8	16	—	1	17	—	2	31	33	1	3	37	54
vehicle lighted, facing against traffic.	—	—	—	—	—	—	—	—	1	—	1	—	—	1	1
vehicle not lighted ; daylight ...	—	2	5	7	—	1	8	—	1	8	9	—	2	11	19
"    "    dusk or semi-darkness.	—	—	—	—	—	—	—	—	—	4	4	—	—	4	4
"    "    dark ... ..	—	2	2	4	—	1	5	—	—	8	8	—	1	9	14
On off side of carriageway to the moving vehicle :—															
vehicle lighted, facing correctly (in direction of traffic).	—	—	2	2	—	—	2	—	—	1	1	—	—	1	3
vehicle not lighted ; daylight ...	—	—	5	5	—	—	5	—	—	7	7	—	1	8	13
<b>Total ... ..</b>	<b>—</b>	<b>13</b>	<b>25</b>	<b>38</b>	<b>1</b>	<b>3</b>	<b>42</b>	<b>—</b>	<b>4</b>	<b>61</b>	<b>65</b>	<b>1</b>	<b>7</b>	<b>73</b>	<b>115</b>
Collision with road works in carriageway	—	—	—	—	—	—	—	—	—	1	1	1	1	3	3
Collision with refuge in carriageway ...	—	2	1	3	—	—	3	—	—	1	1	—	1	2	5
Collision with other obstruction in carriageway.	—	1	4	5	1	2	8	—	—	13	13	2	1	16	24
Collision with obstruction at side of but extending over carriageway.	—	—	5	5	—	—	5	—	—	2	2	—	2	4	9
Collision with object at side of but not extending over carriageway.	—	21	75	96	3	7	106	—	9	202	211	14	37	262	368
<b>TOTAL ... ..</b>	<b>—</b>	<b>37</b>	<b>110</b>	<b>147</b>	<b>5</b>	<b>12</b>	<b>164</b>	<b>—</b>	<b>13</b>	<b>280</b>	<b>293</b>	<b>18</b>	<b>49</b>	<b>360</b>	<b>524</b>
Accident not involving collision :—															
Vehicle overturning ... ..	—	1	9	10	—	—	10	—	2	47	49	3	10	62	72
Pedal cyclist thrown or falling from cycle	—	4	20	24	—	4	28	—	1	35	36	3	5	44	72
Pedestrian boarding or alighting from vehicle in motion.	—	9	20	29	1	7	37	—	—	9	9	—	1	10	47
Horse (with vehicle) bolting, falling, etc.	1	4	7	12	—	—	12	—	—	10	10	—	1	11	23
Other than above ... ..	1	31	71	103	7	17	127	—	5	147	152	18	19	189	316
<b>TOTAL ... ..</b>	<b>2</b>	<b>49</b>	<b>127</b>	<b>178</b>	<b>8</b>	<b>28</b>	<b>214</b>	<b>—</b>	<b>8</b>	<b>248</b>	<b>256</b>	<b>24</b>	<b>36</b>	<b>316</b>	<b>530</b>
Multiple Accident ... ..	—	40	66	106	—	5	111	—	4	35	39	1	5	45	156
<b>GRAND TOTAL ... ..</b>	<b>17</b>	<b>1,237</b>	<b>2,415</b>	<b>3,669</b>	<b>129</b>	<b>351</b>	<b>4,149</b>	<b>—</b>	<b>127</b>	<b>2,197</b>	<b>2,324</b>	<b>141</b>	<b>328</b>	<b>2,793</b>	<b>6,942</b>

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.2.—Statement showing the number of accidents, analysed to indicate the nature of the accidents and the features of the locality where they occurred.

Features of locality.	Built-up Areas.						Areas not Built-up.						GRAND TOTAL.		
	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.		Multiple accident.	Total.
<b>At Road Junctions or Cross Roads:—</b>															
Controlled:—															
By Police—View open ... ..	6	19	1	1	2	1	30	4	—	—	—	—	—	4	34
"    View obscured ... ..	2	5	—	—	—	1	8	—	1	—	—	—	—	1	9
By Traffic Signals—View open ... ..	6	16	—	2	1	1	26	2	—	—	—	—	—	2	28
"    "    View obscured ... ..	3	2	—	—	—	1	6	—	—	—	—	—	—	—	6
<b>Total—Controlled ... ..</b>	<b>17</b>	<b>42</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>70</b>	<b>6</b>	<b>1</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>7</b>	<b>77</b>
Uncontrolled:—															
Warning Signs—View open ... ..	49	22	—	3	5	2	81	55	14	—	5	5	2	81	162
"    "    View obscured ... ..	49	10	—	1	—	3	63	79	2	—	2	1	1	85	148
No Warning Signs—View open ... ..	269	184	—	14	10	21	498	145	39	—	12	13	4	213	711
"    "    View obscured ... ..	167	42	—	7	5	6	227	150	10	—	1	7	—	168	395
<b>Total—Uncontrolled ... ..</b>	<b>534</b>	<b>258</b>	<b>—</b>	<b>25</b>	<b>20</b>	<b>32</b>	<b>869</b>	<b>429</b>	<b>65</b>	<b>—</b>	<b>20</b>	<b>26</b>	<b>7</b>	<b>547</b>	<b>1,416</b>
<b>Total—At Road Junctions or Cross Roads ... ..</b>	<b>551</b>	<b>300</b>	<b>1</b>	<b>28</b>	<b>23</b>	<b>36</b>	<b>939</b>	<b>435</b>	<b>66</b>	<b>—</b>	<b>20</b>	<b>26</b>	<b>7</b>	<b>554</b>	<b>1,493</b>

Straight road ... ..	382	1,891	5	73	148	53	2,552	402	582	28	144	152	22	1,330	3,882
Open road bend (i.e. with good sight line) ...	102	244	—	38	26	8	418	190	127	4	104	71	10	506	924*
Blind road bend (i.e. with bad sight line) ...	25	23	—	9	2	4	63	103	7	3	47	15	1	176	239*
Steep hill with good sight line ... ..	19	59	—	7	11	4	100	21	48	4	22	40	3	138	238*
Steep hill with bad sight line ... ..	7	7	—	6	2	—	22	17	5	1	18	8	1	50	72*
Railway level crossing ... ..	—	5	—	—	—	—	5	—	2	—	—	1	—	3	8*
Excessive camber ... ..	—	2	—	—	—	1	3	—	1	—	1	2	—	4	7*
Gradient interfering with view ... ..	4	3	—	1	1	2	11	15	3	—	1	1	—	20	31*
Bottleneck ... ..	8	19	—	2	—	2	31	3	4	—	3	—	1	11	42*
Moderate hill ... ..	—	—	—	—	—	—	—	1	—	—	—	—	—	1	1
Entrance to garage or yard across footpath ...	—	2	—	—	—	1	3	—	—	—	—	—	—	—	3
Walled passage leading off main road ... ..	—	—	—	—	1	—	1	—	—	—	—	—	—	—	1
Private coaching station ... ..	—	1	—	—	—	—	1	—	—	—	—	—	—	—	1
<b>GRAND TOTAL ... ..</b>	<b>1,098</b>	<b>2,556</b>	<b>6</b>	<b>164</b>	<b>214</b>	<b>111</b>	<b>4,149</b>	<b>1,187</b>	<b>845</b>	<b>40</b>	<b>360</b>	<b>316</b>	<b>45</b>	<b>2,793</b>	<b>6,942</b>

\* Cases in which more than one feature was reported are entered under one feature only. The total number of cases in which the following features were reported was :—

Open road bend ... ..	926
Blind road bend ... ..	240
Steep hill with good sight line ... ..	249
Steep hill with bad sight line ... ..	80
Railway level crossing ... ..	11
Excessive camber ... ..	14
Gradient interfering with view ... ..	37
Bottleneck ... ..	48

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.3.—Statement showing the number of accidents, analysed to indicate the nature of the accident, the width of carriageway and the density of traffic at the time of the accident.

Nature of Accident.	Width of Carriageway.	Built-up Areas.									Areas not Built-up.									GRAND TOTAL.			
		Density of Traffic.									Density of Traffic.												
		One Way.*			Two Way.			Other exceptional conditions.	Not reported.	Total.	One Way.*			Two Way.			Other exceptional conditions.	Not reported.	Total.				
		Dense.	Moderate.	Very light.	Dense.		Moderate.				Very light.	Dense.	Moderate.	Very light.	Dense.						Moderate.	Very light.	
In one direction.	In both directions.				In one direction.	In both directions.																	
Collision between moving vehicles	<i>Exceeding.</i> ft.																						
	<i>Not Exceeding.</i> ft.																						
	—	—	—	—	—	—	1	—	—	1	—	—	—	—	—	—	—	—	—	—	—	4	5
	10	15	—	—	—	—	2	7	—	9	—	—	—	—	—	—	—	—	—	—	—	71	80
	15	20	—	—	1	1	2	26	54	85	—	—	—	—	—	—	—	—	—	—	—	342	427
	20	25	—	2	3	1	4	92	146	249	—	—	—	—	—	—	—	—	—	—	—	368	617
	25	30	—	—	2	4	6	103	154	271	—	—	1	5	6	129	225	1	1	—	—	219	490
	30	40	—	1	1	4	13	153	157	329	—	—	—	6	1	87	124	1	—	—	—	218	457
	40	50	—	—	—	1	5	43	44	95	—	—	—	1	—	11	27	—	—	—	—	39	134
	50	60	—	—	—	—	6	13	14	33	—	—	—	—	—	4	4	—	—	—	—	8	41
60	—	—	—	1	—	2	7	16	26	—	—	—	—	—	5	3	—	—	—	—	8	34	
	Total ...	—	3	8	11	38	440	592	6	1,098	—	—	1	14	8	386	774	3	1	1,187	2,285		
Collision between one vehicle and pedestrian.	—	10	—	—	—	—	—	7	1	8	—	—	—	—	—	—	5	—	—	—	5	13	
	10	15	—	—	—	—	5	34	—	39	—	—	—	—	—	—	40	—	—	—	40	79	
	15	20	—	2	2	3	4	38	138	190	—	—	—	—	—	48	201	1	—	—	248	438	
	20	25	1	1	3	5	6	155	243	422	—	1	—	—	—	73	158	1	—	—	233	655	
	25	30	—	1	3	2	3	216	323	552	—	2	—	—	—	58	96	—	—	—	156	706	
	30	40	—	2	2	11	41	433	412	909	—	—	—	2	2	36	66	1	—	—	107	1,016	
	40	50	1	2	1	2	20	141	113	280	—	—	—	1	1	14	16	—	—	—	32	312	
	50	60	—	1	—	2	13	50	23	89	—	—	1	—	1	5	8	—	—	—	15	104	
	60	—	—	—	1	3	9	32	19	64	—	—	—	—	—	5	4	—	—	—	9	73	
		Total ...	2	9	12	28	96	1,070	1,312	22	2,553	—	3	1	3	4	237	594	3	—	845	3,398	
Collision between one vehicle and animal.	—	10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1	—	—	—	1	1	
	10	15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8	—	—	—	8	8	
	15	20	—	—	—	—	—	—	2	2	—	—	—	—	—	2	13	—	—	—	15	17	
	20	25	—	—	—	—	—	—	—	—	—	—	—	—	—	2	7	—	—	—	9	9	
	25	30	—	—	—	—	—	—	1	1	—	—	—	—	—	1	3	—	—	—	4	5	
	30	40	—	—	—	—	—	1	1	2	—	—	—	—	—	—	3	—	—	—	3	5	
40	50	—	—	—	—	—	1	—	1	—	—	—	—	—	—	—	—	—	—	—	—	1	
	Total ...	—	—	—	—	—	2	4	—	6	—	—	—	—	—	5	35	—	—	40	48		



FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.4.—Statement showing the number of accidents, analysed to indicate the condition of weather and light and the nature of the accident.

Weather.	Light.	Built-up Areas.							Areas not Built-up.							GRAND TOTAL.
		Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	
Clear (i.e., normal visibility) ...	Daylight ... ..	722	1,471	3	77	142	70	2,485	720	453	13	160	109	23	1,568	4,063
	Dusk or semi-darkness ... ..	39	87	—	11	5	2	144	55	47	4	27	17	2	162	296
	Dark ; no street lighting ... ..	30	29	2	12	4	2	79	168	141	14	84	28	11	446	525
	Dark ; central lighting, good ... ..	26	77	—	1	6	1	111	3	7	—	1	—	—	11	122
	Dark ; central lighting, poor ... ..	1	4	—	—	—	1	6	—	—	—	—	—	—	—	6
	Dark ; side lighting, good ... ..	102	407	—	24	29	14	576	29	35	2	9	9	2	86	662
	Dark ; side lighting, poor ... ..	36	115	—	5	8	4	168	34	47	2	4	3	2	92	260
	Total ... ..	956	2,190	5	130	194	94	3,569	1,009	780	35	285	256	40	2,355	5,924
Rain, slight ... ..	Daylight ... ..	42	71	1	2	5	6	127	40	9	—	11	17	1	78	205
	Dusk or semi-darkness ... ..	3	9	—	—	—	—	12	4	6	1	2	1	—	14	26
	Dark ; no street lighting ... ..	2	2	—	1	—	—	5	9	7	1	10	6	—	33	38
	Dark ; central lighting, good ... ..	7	16	—	1	1	1	26	—	1	—	—	—	—	1	27
	Dark ; central lighting, poor ... ..	1	1	—	—	—	—	2	—	—	—	—	—	—	—	2
	Dark ; side lighting, good ... ..	14	54	—	5	1	—	74	5	6	—	1	1	—	13	67
	Dark ; side lighting, poor ... ..	2	22	—	—	1	—	25	4	6	—	1	—	—	11	36
	Total ... ..	71	175	1	9	8	7	371	62	35	2	25	25	1	150	421
Rain, heavy ... ..	Daylight ... ..	13	28	—	4	4	2	51	13	4	—	6	3	—	26	77
	Dusk or semi-darkness ... ..	2	4	—	1	—	—	7	2	1	1	—	—	—	4	11
	Dark ; no street lighting ... ..	1	2	—	1	—	1	5	4	2	—	4	—	2	12	17
	Dark ; central lighting, good ... ..	1	6	—	—	—	—	7	—	—	—	1	—	—	1	8
	Dark ; side lighting, good ... ..	7	32	—	1	—	1	41	3	4	—	2	1	—	10	51
	Dark ; side lighting, poor ... ..	1	13	—	—	—	—	14	2	3	—	—	—	—	5	19
	Total ... ..	25	85	—	7	4	4	125	24	14	1	13	4	2	58	183
	Fog or Mist ... ..	Daylight ... ..	12	13	—	1	1	1	28	25	3	—	3	2	—	33
Dusk or semi-darkness ... ..		4	6	—	1	—	—	11	2	5	—	3	2	—	12	23
Dark ; no street lighting ... ..		1	6	—	4	2	—	13	20	17	2	14	9	1	63	76
Dark ; central lighting, good ... ..		—	2	—	1	—	—	3	—	—	—	—	—	—	—	3
Dark ; central lighting, poor ... ..		—	1	—	—	—	—	1	—	—	—	—	—	—	—	1
Dark ; side lighting, good ... ..		8	30	—	3	1	2	44	1	4	—	1	2	—	8	52
Dark ; side lighting, poor ... ..		3	12	—	—	—	2	17	3	10	—	—	—	—	13	30
Dark ; street lamps extinguished... ..		—	1	—	—	—	—	1	—	—	—	—	—	—	—	1
Total ... ..	28	71	—	10	4	5	118	51	39	2	21	15	1	129	247	



Snow	Daylight	2	1	—	1	—	—	4	—	—	—	—	1	—	1	5
	Dusk or semi-darkness	—	—	—	—	—	—	—	1	—	—	1	—	—	—	2
	Dark ; no street lighting	—	1	—	—	—	—	1	1	—	—	3	—	—	—	6
	Dark ; central lighting, good	—	2	—	—	—	—	2	—	—	—	—	—	—	—	2
	Dark ; central lighting, poor	—	1	—	—	—	—	1	—	—	—	—	—	—	—	1
	Dark ; side lighting, good	—	1	—	—	—	—	1	—	2	—	—	—	—	—	2
Total		2	6	—	1	—	—	9	2	3	—	4	1	—	10	19
Ice or Frost	Daylight	5	8	—	3	2	1	19	11	2	—	3	3	1	20	39
	Dusk or semi-darkness	1	—	—	—	—	—	1	3	—	—	1	1	—	5	6
	Dark ; no street lighting	—	1	—	—	—	—	1	3	5	—	3	4	—	15	16
	Dark ; central lighting, good	1	—	—	2	—	—	3	—	—	—	—	—	—	—	3
	Dark ; side lighting, good	3	2	—	—	—	—	5	1	1	—	—	—	—	2	7
	Dark ; side lighting, poor	—	7	—	—	—	—	7	—	1	—	—	1	—	2	9
Total		10	18	—	5	2	1	36	18	9	—	7	9	1	44	80
Strong Wind	Daylight	1	1	—	1	—	—	3	6	1	—	2	3	—	12	15
	Dusk or semi-darkness	—	—	—	—	—	—	—	—	1	—	1	1	—	3	3
	Dark ; no street lighting	—	—	—	—	—	—	—	3	7	—	1	—	—	11	11
	Dark ; side lighting, good	2	1	—	—	—	—	3	2	—	—	—	—	—	2	5
	Dark ; side lighting, poor	—	2	—	—	—	—	2	1	3	—	—	—	—	4	6
Total		3	4	—	1	—	—	8	12	12	—	4	4	—	32	40
Rain and Strong Wind or Snow and Strong Wind.	Daylight	1	2	—	—	—	—	3	5	—	—	1	—	—	6	9
	Dusk or semi-darkness	—	—	—	—	—	—	—	1	—	—	—	—	—	1	1
	Dark ; no street lighting	—	—	—	1	—	—	1	2	2	—	—	2	—	6	7
	Dark ; central lighting, good	—	—	—	—	1	—	1	—	—	—	—	—	—	—	1
	Dark ; side lighting, good	2	4	—	—	1	—	7	—	—	—	—	—	—	—	7
	Dark ; side lighting, poor	—	1	—	—	—	—	1	1	1	—	—	—	—	2	3
Total		3	7	—	1	2	—	13	9	3	—	1	2	—	15	28
All Weather Conditions	Daylight	798	1,595	4	89	154	80	2,720	820	472	13	186	228	25	1,744	4,464
	Dusk or semi-darkness	49	106	—	13	5	2	175	68	60	6	35	22	2	193	368
	Dark ; no street lighting	34	41	2	19	6	3	105	210	182	17	119	49	14	591	696
	Dark ; central lighting, good	35	103	—	5	8	2	153	3	8	—	2	—	—	13	166
	Dark ; central lighting, poor	2	7	—	—	—	1	10	—	—	—	—	—	—	—	10
	Dark ; side lighting, good	138	531	—	33	32	17	751	41	52	2	13	13	2	123	874
	Dark ; side lighting, poor	42	172	—	5	9	6	234	45	71	2	5	4	2	129	363
	Dark ; street lamps extinguished	—	1	—	—	—	—	1	—	—	—	—	—	—	—	1
	GRAND TOTAL	1,098	2,556	6	164	214	111	4,149	1,187	845	40	360	316	45	2,793	6,942

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.5.—Statement showing the number of accidents occurring at each hour of the day on Mondays to Fridays (inclusive), Saturdays, Sundays, and Bank Holidays, analysed separately for Winter and Summer Months.

Day and Hour.	Built-up Areas.														Areas not Built-up.														GRAND TOTAL.			
	Winter Months.							Summer Months.							Winter Months.							Summer Months.										
	January.	February.	March.	October.	November.	December.	Total.	April.	May.	June.	July.	August.	September.	Total.	January.	February.	March.	October.	November.	December.	Total.	April.	May.	June.	July.	August.	September.	Total.				
<b>Mondays to Fridays (excluding Bank Holidays)</b>																																
Midnight to 1 a.m. ...	—	1	1	1	2	3	8	—	—	1	2	2	1	6	14	1	—	—	2	1	1	5	6	—	—	2	4	4	3	19	24	38
1 a.m. „ 2 a.m. ...	—	1	—	—	—	2	3	—	—	1	1	2	1	5	6	1	—	—	—	—	—	1	—	1	—	—	—	—	2	4	5	13
2 a.m. „ 3 a.m. ...	1	—	—	—	—	—	1	—	—	—	—	—	—	—	—	1	—	—	2	—	—	3	1	—	—	—	—	—	—	7	10	13
3 a.m. „ 4 a.m. ...	1	—	1	1	—	—	3	—	—	—	—	—	—	—	—	—	—	—	—	1	—	2	—	—	—	—	—	—	1	1	2	5
4 a.m. „ 5 a.m. ...	—	1	—	—	—	—	1	—	—	—	—	—	—	—	—	—	—	1	—	—	—	2	—	—	—	—	—	—	1	2	4	6
5 a.m. „ 6 a.m. ...	5	1	1	3	2	1	13	—	1	1	1	2	2	7	20	1	2	1	4	3	9	14	—	1	2	1	—	3	7	21	41	
6 a.m. „ 7 a.m. ...	3	5	3	5	6	5	27	1	2	5	5	7	—	20	47	6	—	5	2	8	6	27	1	3	2	7	7	3	23	50	97	
7 a.m. „ 8 a.m. ...	4	4	12	6	10	7	43	8	10	13	5	7	6	49	92	8	4	5	7	10	6	40	4	6	5	11	4	3	33	73	165	
8 a.m. „ 9 a.m. ...	7	7	6	15	12	11	58	6	16	7	11	7	13	60	118	8	9	3	7	8	4	39	3	7	5	4	3	6	28	67	185	
9 a.m. „ 10 a.m. ...	13	7	10	6	9	2	47	3	9	6	5	8	6	37	84	1	3	3	3	7	6	23	3	1	3	5	8	5	25	48	132	
10 a.m. „ 11 a.m. ...	8	4	12	7	12	8	51	4	17	10	11	18	14	74	125	5	1	6	4	3	3	22	5	5	7	6	9	4	36	58	183	
11 a.m. „ 12 noon ...	16	7	12	17	13	9	74	11	13	7	12	10	14	67	141	6	3	6	6	4	4	29	3	4	4	5	7	10	33	62	203	
12 noon „ 1 p.m. ...	14	20	24	23	27	19	127	18	22	12	19	21	17	109	236	7	3	7	3	6	8	34	4	6	1	6	7	4	28	62	208	
1 p.m. „ 2 p.m. ...	21	6	18	20	14	17	96	13	15	18	11	15	15	87	183	6	4	7	6	5	5	33	5	9	10	9	12	10	55	88	271	
2 p.m. „ 3 p.m. ...	4	3	17	15	15	12	68	13	14	15	13	16	14	85	151	2	6	7	12	7	11	45	1	6	11	11	14	54	99	250		
3 p.m. „ 4 p.m. ...	6	16	21	19	18	9	89	15	7	15	6	28	15	86	175	6	6	17	9	13	7	58	7	7	10	10	11	55	113	288		
4 p.m. „ 5 p.m. ...	14	9	29	20	26	26	124	12	15	21	22	21	16	107	231	11	7	12	10	20	18	78	10	12	14	10	14	8	68	146	377	
5 p.m. „ 6 p.m. ...	30	16	21	40	41	31	179	19	29	26	19	22	23	136	317	25	11	11	11	20	17	95	9	17	9	16	18	14	83	178	495	
6 p.m. „ 7 p.m. ...	25	24	20	35	27	29	160	18	17	24	22	25	20	126	286	10	12	8	18	14	14	76	8	12	5	11	14	7	67	133	419	
7 p.m. „ 8 p.m. ...	16	12	21	28	24	16	117	9	21	16	27	15	24	112	229	7	6	6	15	14	12	60	6	14	7	8	16	13	64	124	353	
8 p.m. „ 9 p.m. ...	9	10	11	18	12	9	69	8	16	10	11	15	23	83	152	5	5	10	8	11	7	46	7	5	14	9	7	14	56	102	254	
9 p.m. „ 10 p.m. ...	4	6	10	7	9	7	43	9	12	11	12	16	15	76	118	2	5	7	15	12	15	56	5	9	5	10	14	12	55	111	229	
10 p.m. „ 11 p.m. ...	15	8	14	8	17	7	69	7	13	9	14	13	23	79	148	3	3	9	12	4	2	33	5	15	14	19	13	12	78	111	259	
11 p.m. „ Midnight ...	—	5	8	8	4	9	34	4	3	10	3	5	4	29	63	2	1	1	3	3	—	10	4	3	6	3	6	6	28	38	101	
<b>Total ...</b>	<b>216</b>	<b>173</b>	<b>272</b>	<b>302</b>	<b>300</b>	<b>239</b>	<b>1,502</b>	<b>178</b>	<b>254</b>	<b>238</b>	<b>232</b>	<b>276</b>	<b>266</b>	<b>1,444</b>	<b>2,946</b>	<b>124</b>	<b>91</b>	<b>132</b>	<b>159</b>	<b>174</b>	<b>150</b>	<b>830</b>	<b>97</b>	<b>146</b>	<b>137</b>	<b>166</b>	<b>186</b>	<b>168</b>	<b>899</b>	<b>1,729</b>	<b>4,675</b>	

83993

Saturdays.

Midnight to 1 a.m.	—	—	1	—	1	—	2	—	—	—	—	—	—	2	—	—	—	—	2	—	—	1	—	1	—	—	2	4	6		
1 a.m. to 2 a.m.	—	—	1	—	—	1	1	—	—	1	—	—	—	1	2	—	—	—	—	1	—	—	—	—	—	—	1	3	5		
2 a.m. to 3 a.m.	—	1	1	—	—	—	—	—	—	—	—	—	—	2	4	—	—	—	—	—	—	—	—	—	—	—	2	6	6		
3 a.m. to 4 a.m.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1	1	4		
4 a.m. to 5 a.m.	—	1	—	—	—	—	1	—	—	—	—	—	—	1	1	—	—	—	—	1	—	—	—	—	—	—	1	3	7		
5 a.m. to 6 a.m.	—	—	2	—	1	—	3	—	—	1	1	—	—	2	5	—	—	—	—	2	—	—	—	—	—	—	—	2	7		
6 a.m. to 7 a.m.	—	—	—	—	—	—	—	—	2	1	1	1	2	7	7	3	—	1	—	1	—	5	—	—	2	6	—	8	20		
7 a.m. to 8 a.m.	4	1	1	2	1	5	14	1	—	1	5	2	2	11	25	4	—	1	—	4	—	13	—	—	6	—	6	13	20		
8 a.m. to 9 a.m.	1	—	3	2	2	1	9	1	2	2	—	—	2	7	16	1	1	—	—	2	4	—	1	—	3	2	2	1	44		
9 a.m. to 10 a.m.	2	1	—	1	1	—	4	1	1	1	3	1	2	9	13	1	2	—	2	—	1	6	—	—	4	4	—	8	27		
10 a.m. to 11 a.m.	2	—	3	1	2	2	10	6	3	3	2	2	6	22	32	1	—	1	—	1	1	6	—	—	1	2	4	8	27		
11 a.m. to 12 noon	1	3	4	3	4	3	18	5	1	5	3	5	6	25	43	2	—	—	1	1	2	4	2	2	2	1	2	3	12	44	
12 noon to 1 p.m.	3	1	1	6	4	9	24	10	4	7	3	3	7	34	58	—	4	3	2	2	1	12	4	2	3	7	1	7	24	61	
1 p.m. to 2 p.m.	1	2	4	4	3	8	22	7	4	5	4	10	5	35	57	1	1	2	3	5	3	15	4	6	3	3	5	4	36	94	
2 p.m. to 3 p.m.	2	2	5	5	4	3	21	3	2	2	5	7	9	28	49	—	2	3	3	2	4	14	5	5	3	7	5	7	25	97	
3 p.m. to 4 p.m.	2	2	4	3	—	3	14	3	5	3	5	2	3	21	35	1	2	2	3	4	2	14	5	1	4	2	5	6	23	65	
4 p.m. to 5 p.m.	3	2	1	5	4	4	19	7	5	4	9	2	5	32	51	1	1	1	2	2	5	12	4	3	3	5	4	3	22	72	
5 p.m. to 6 p.m.	3	4	5	3	4	9	28	3	6	1	3	4	1	18	46	1	2	2	2	6	6	19	2	7	3	5	8	2	27	85	
6 p.m. to 7 p.m.	3	2	1	4	5	8	28	3	4	2	4	3	4	20	48	2	4	2	3	3	3	17	3	—	4	3	5	1	16	92	
7 p.m. to 8 p.m.	6	4	2	8	7	4	31	5	4	7	5	6	7	34	65	1	1	1	2	2	4	11	4	—	1	7	4	4	20	97	
8 p.m. to 9 p.m.	3	1	1	2	2	2	11	3	3	1	3	3	6	19	30	9	2	1	1	2	3	18	2	3	—	3	7	5	20	106	
9 p.m. to 10 p.m.	3	2	1	3	3	2	14	3	1	5	4	8	5	26	40	4	1	—	2	1	6	14	5	—	3	1	12	11	32	113	
10 p.m. to 11 p.m.	2	2	3	7	5	3	22	9	5	7	9	2	7	39	61	1	—	5	7	2	5	20	6	1	2	7	7	9	32	113	
11 p.m. to Midnight	2	4	—	5	1	6	18	2	3	2	6	3	6	22	40	1	—	1	2	2	3	9	2	4	2	5	4	5	22	71	
Total	48	35	43	63	54	73	316	72	55	62	75	65	85	414	730	36	24	25	39	40	58	222	49	36	38	72	80	75	350	572	1,302

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.5. (continued)—Statement showing the number of accidents occurring at each hour of the day on Mondays to Fridays (inclusive), Saturdays, Sundays, and Bank Holidays, analysed separately for Winter and Summer Months.

Day and Hour.	Built-up Areas.														Areas not Built-up.														GRAND TOTAL.		
	Winter Months.							Summer Months.							Winter Months.							Summer Months.									
	January.	February.	March.	October.	November.	December.	Total.	April.	May.	June.	July.	August.	September.	Total.	January.	February.	March.	October.	November.	December.	Total.	April.	May.	June.	July.	August.	September.	Total.			
<b>Sundays.</b>																															
Midnight to 1 a.m. ...	1	1	1	2	2	9	2	—	1	1	2	1	7	16	—	—	—	1	—	2	3	—	—	—	—	2	5	21			
1 a.m. " 2 a.m. ...	2	—	—	—	1	3	—	1	—	2	—	—	3	6	1	—	—	—	—	1	2	—	—	—	—	3	5	11			
2 a.m. " 3 a.m. ...	2	—	—	—	—	2	—	—	—	—	—	—	1	3	1	—	—	—	—	—	—	—	—	—	—	1	2	5			
3 a.m. " 4 a.m. ...	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—			
4 a.m. " 5 a.m. ...	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—			
5 a.m. " 6 a.m. ...	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—			
6 a.m. " 7 a.m. ...	1	—	—	1	—	3	—	—	1	—	—	1	2	5	—	1	—	—	—	—	1	—	—	—	1	2	8				
7 a.m. " 8 a.m. ...	—	—	—	—	—	1	—	1	—	—	—	1	2	2	—	—	—	—	—	—	—	—	—	—	—	—	—	—			
8 a.m. " 9 a.m. ...	1	—	—	—	—	1	—	—	—	—	—	1	4	5	—	—	—	—	—	—	—	—	—	—	—	—	—	—			
9 a.m. " 10 a.m. ...	—	—	1	—	1	3	1	1	—	—	3	3	10	13	—	—	—	—	—	—	1	—	—	—	—	—	—	—			
10 a.m. " 11 a.m. ...	—	—	1	1	1	3	2	1	1	2	5	5	16	19	—	2	4	—	2	1	1	—	—	—	3	3	17	36			
11 a.m. " 12 noon ...	1	2	2	—	1	6	3	1	1	3	3	2	13	19	1	—	3	1	2	1	8	3	2	3	7	3	22	49			
12 noon " 1 p.m. ...	1	2	—	3	4	11	4	5	2	7	7	2	27	38	1	—	4	1	—	2	6	3	3	2	3	4	17	25	63		
1 p.m. " 2 p.m. ...	1	2	5	3	4	16	1	2	2	4	3	2	14	30	1	—	2	2	—	1	6	3	3	3	4	4	20	26	56		
2 p.m. " 3 p.m. ...	1	1	1	2	3	13	5	2	2	3	2	2	16	29	—	1	3	3	—	4	12	3	3	1	5	3	19	31	60		
3 p.m. " 4 p.m. ...	1	1	2	1	2	8	3	7	3	5	4	4	26	34	1	1	2	2	2	4	12	3	6	2	6	1	10	28	40	74	
4 p.m. " 5 p.m. ...	—	2	2	1	2	9	3	3	4	1	—	1	12	21	1	3	1	3	1	9	2	2	3	1	4	—	13	22	43		
5 p.m. " 6 p.m. ...	3	1	—	4	1	10	1	1	1	3	3	5	14	24	2	—	3	4	1	12	1	1	1	2	4	4	13	25	49		
6 p.m. " 7 p.m. ...	4	1	—	3	3	12	1	2	2	3	—	—	8	20	3	1	2	2	2	11	2	1	1	—	3	3	9	20	40		
7 p.m. " 8 p.m. ...	1	3	—	4	—	12	3	4	2	—	2	1	12	24	—	—	—	2	3	1	6	2	3	3	4	4	5	21	27	51	
8 p.m. " 9 p.m. ...	1	1	2	2	—	6	1	2	1	4	—	5	13	19	1	1	1	—	1	5	4	2	3	3	2	3	9	23	28	47	
9 p.m. " 10 p.m. ...	—	2	2	4	3	14	1	—	3	2	4	1	11	25	3	—	3	3	1	11	2	3	3	7	4	3	22	33	58		
10 p.m. " 11 p.m. ...	3	4	1	3	6	24	4	9	2	5	2	5	27	51	1	2	2	4	2	15	5	5	5	8	6	2	31	46	97		
11 p.m. " Midnight ...	1	—	—	3	1	5	2	1	5	2	—	—	10	15	1	—	1	1	—	4	—	1	—	3	2	1	7	11	26	26	
<b>Total ...</b>	<b>25</b>	<b>23</b>	<b>20</b>	<b>37</b>	<b>35</b>	<b>30</b>	<b>170</b>	<b>37</b>	<b>43</b>	<b>35</b>	<b>49</b>	<b>42</b>	<b>42</b>	<b>248</b>	<b>418</b>	<b>19</b>	<b>12</b>	<b>32</b>	<b>29</b>	<b>22</b>	<b>25</b>	<b>139</b>	<b>34</b>	<b>38</b>	<b>30</b>	<b>64</b>	<b>55</b>	<b>59</b>	<b>280</b>	<b>419</b>	<b>837</b>

Bank Holidays.*																																	
Midnight to 1 a.m. ....																																	
1 a.m. " 2 a.m. ....						1	1																										
2 a.m. " 3 a.m. ....																																	
3 a.m. " 4 a.m. ....																																	
4 a.m. " 5 a.m. ....																																	
5 a.m. " 6 a.m. ....																																	
6 a.m. " 7 a.m. ....																																	
7 a.m. " 8 a.m. ....										1																							
8 a.m. " 9 a.m. ....										1												1											
9 a.m. " 10 a.m. ....																																	
10 a.m. " 11 a.m. ....						1	1			1												2											
11 a.m. " 12 noon ...	1					1	2			1												3											
12 noon " 1 p.m. ....										2												1											
1 p.m. " 2 p.m. ....											1																						
2 p.m. " 3 p.m. ....						1	1	2					2	4	5							3											
3 p.m. " 4 p.m. ....										2				3	3																		
4 p.m. " 5 p.m. ....						1	1	1						2	8	6																	
5 p.m. " 6 p.m. ....						4	4	1		1				2																			
6 p.m. " 7 p.m. ....	1						1	2		2				4	5																		
7 p.m. " 8 p.m. ....								1						1	1																		
8 p.m. " 9 p.m. ....								1						2	2							2											
9 p.m. " 10 p.m. ....						1	1	1		3				5	6																		
10 p.m. " 11 p.m. ....						1	1	5		1				6	7																		
11 p.m. " Midnight ...						1	1			1				3																			
<b>Total</b> ... ..	<b>2</b>					<b>12</b>	<b>14</b>	<b>14</b>	<b>1</b>	<b>15</b>		<b>11</b>		<b>41</b>	<b>55</b>						<b>12</b>	<b>12</b>	<b>28</b>	<b>2</b>	<b>18</b>		<b>18</b>				<b>61</b>	<b>73</b>	<b>128</b>
<b>GRAND TOTAL</b> ...	<b>291</b>	<b>231</b>	<b>335</b>	<b>402</b>	<b>389</b>	<b>354</b>	<b>2,002</b>	<b>301</b>	<b>353</b>	<b>350</b>	<b>356</b>	<b>394</b>	<b>393</b>	<b>2,147</b>	<b>4,149</b>	<b>179</b>	<b>127</b>	<b>189</b>	<b>227</b>	<b>236</b>	<b>245</b>	<b>1,203</b>	<b>208</b>	<b>221</b>	<b>223</b>	<b>304</b>	<b>334</b>	<b>300</b>	<b>1,590</b>	<b>2,793</b>	<b>6,942</b>		

Note.\*—Includes April 14th (Friday), August 7th (Monday) and December 26th (Monday). Also, for England and Wales, April 17th (Monday), June 5th (Monday), December 26th (Tuesday), and, for Scotland, January 2nd (Monday) and May 1st (Monday).

ALL DAYS AT EACH HOUR.

Hour.	Built-up Areas.	Areas not Built-up.	Total.	Percentage per hour.	Hour.	Built-up Areas.	Areas not Built-up.	Total.	Percentage per hour.
Midnight to 1 a.m. ....	32	33	65	0.9	12 noon to 1 p.m. ....	334	127	461	6.7
1 a.m. " 2 a.m. ....	17	14	31	0.4	1 p.m. " 2 p.m. ....	271	159	430	6.2
2 a.m. " 3 a.m. ....	10	14	24	0.3	2 p.m. " 3 p.m. ....	234	182	416	6.0
3 a.m. " 4 a.m. ....	8	5	8	0.1	3 p.m. " 4 p.m. ....	247	191	438	6.3
4 a.m. " 5 a.m. ....	3	7	10	0.1	4 p.m. " 5 p.m. ....	308	205	511	7.4
5 a.m. " 6 a.m. ....	25	26	51	0.7	5 p.m. " 6 p.m. ....	393	252	645	9.3
6 a.m. " 7 a.m. ....	59	66	125	1.8	6 p.m. " 7 p.m. ....	359	193	552	8.0
7 a.m. " 8 a.m. ....	120	97	217	3.1	7 p.m. " 8 p.m. ....	319	187	506	7.3
8 a.m. " 9 a.m. ....	141	89	230	3.3	8 p.m. " 9 p.m. ....	203	174	377	5.4
9 a.m. " 10 a.m. ....	110	69	179	2.6	9 p.m. " 10 p.m. ....	189	192	381	5.5
10 a.m. " 11 a.m. ....	178	93	271	3.9	10 p.m. " 11 p.m. ....	267	221	488	7.0
11 a.m. " 12 noon ...	206	117	323	4.7	11 p.m. " Midnight ...	123	80	203	3.0

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

A.6.—Statement showing the number of accidents occurring on each day of the week and during each month of the year.

Day.	Built-up Areas.						Areas not Built-up.						GRAND TOTAL.	
	Winter Months.		Summer Months.		Total.		Winter Months.		Summer Months.		Total.		No.	Average No. per day.
	No.	Average No. per day.	No.	Average No. per day.	No.	Average No. per day.	No.	Average No. per day.	No.	Average No. per day.	No.	Average No. per day.		
Monday ...	292	11.7	271	11.7	563	11.7	167	6.7	147	6.4	314	6.6	877	18.3
Tuesday ...	278	11.1	271	10.4	549	10.7	152	6.1	175	6.7	327	6.4	876	17.1
Wednesday ...	287	11.0	284	10.9	571	11.0	160	6.2	178	6.8	338	6.5	909	17.5
Thursday ...	302	11.6	289	11.1	591	11.4	170	6.5	209	8.0	379	7.3	970	18.7
Friday ...	343	13.2	329	13.2	672	13.2	181	7.0	190	7.6	371	7.3	1,043	20.5
Saturday ...	316	12.6	414	15.3	730	14.0	222	8.9	350	13.0	572	11.0	1,302	25.0
Sunday ...	170	6.3	248	9.5	418	7.9	139	5.1	280	10.8	419	7.9	837	15.8
Bank Holiday* ...	14	7.0	41	10.5	55	9.3	12	6.0	61	15.6	73	12.4	128	21.7
<b>Total ...</b>	<b>2,002</b>	<b>11.0</b>	<b>2,147</b>	<b>11.7</b>	<b>4,149</b>	<b>11.4</b>	<b>1,203</b>	<b>6.6</b>	<b>1,590</b>	<b>8.7</b>	<b>2,793</b>	<b>7.6</b>	<b>6,942</b>	<b>19.0</b>
Month.	Number.		Average per day.		Per cent. of total.		Number.		Average per day.		Per cent. of total.		Number.	Per cent. of total.
January ...	291		9.4		7.0		179		5.8		6.4		470	6.8
February ...	231		8.3		5.6		127		4.5		4.5		358	5.2
March ...	335		10.8		8.1		189		6.1		6.8		524	7.5
October ...	402		13.0		9.7		227		7.3		8.1		629	9.1
November ...	389		13.0		9.4		236		7.9		8.5		625	9.0
December ...	354		11.4		8.5		245		7.9		8.8		599	8.6
<b>Total ...</b>	<b>2,002</b>		<b>11.0</b>		<b>48.3</b>		<b>1,203</b>		<b>6.6</b>		<b>43.1</b>		<b>3,205</b>	<b>46.2</b>
April ...	301		10.0		7.2		208		6.9		7.4		509	7.3
May ...	353		11.4		8.5		221		7.1		7.9		574	8.3
June ...	350		11.7		8.4		223		7.4		8.0		573	8.2
July ...	356		11.5		8.6		304		9.8		10.9		660	9.5
August ...	394		12.7		9.5		334		10.8		12.0		728	10.5
September ...	393		13.1		9.5		300		10.0		10.7		693	10.0
<b>Total ...</b>	<b>2,147</b>		<b>11.7</b>		<b>51.7</b>		<b>1,590</b>		<b>8.7</b>		<b>56.9</b>		<b>3,737</b>	<b>53.8</b>
<b>GRAND TOTAL ...</b>	<b>4,149</b>		<b>11.4</b>		<b>100.0</b>		<b>2,793</b>		<b>7.6</b>		<b>100.0</b>		<b>6,942</b>	<b>100.0</b>

\* The averages have been weighted to reflect the different Bank Holidays in England and Wales and in Scotland respectively—see note on page 25.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

B.1.—Statement showing the total number of vehicles involved in accidents, analysed to indicate the class of vehicle concerned.

Class of Vehicle.	Built-up Areas.							Areas not Built-up.							GRAND TOTAL.
	England (including Monmouthshire).				Wales.	Scotland.	Total, Great Britain.	England (including Monmouthshire).				Wales.	Scotland.	Total, Great Britain.	
	City of London.	Metropolitan Police Area.	Elsewhere.	Total.				City of London.	Metropolitan Police Area.	Elsewhere.	Total.				
Private Motor Vehicles (other than motor cycles).	2	488	938	1,428	42	98	1,568	—	71	970	1,041	48	139	1,228	2,796
Motor Cycles ... ..	—	216	544	760	33	42	835	—	38	888	926	75	123	1,124	1,959
Public Conveyances... ..	8	245	436	689	24	92	805	—	13	174	187	10	41	238	1,043
Motor Vans, Lorries, etc. ... ..	7	388	672	1,067	34	125	1,226	—	30	585	615	18	80	713	1,939
Other mechanically-propelled vehicles*... ..	—	18	30	48	3	4	55	—	2	24	26	—	3	29	84
<b>Total—mechanically-propelled vehicles</b>	<b>17</b>	<b>1,355</b>	<b>2,620</b>	<b>3,992</b>	<b>136</b>	<b>361</b>	<b>4,489</b>	<b>—</b>	<b>154</b>	<b>2,641</b>	<b>2,795</b>	<b>151</b>	<b>386</b>	<b>3,332</b>	<b>7,821</b>
Pedal Cycles ... ..	1	252	560	813	25	36	874	—	38	608	646	40	65	751	1,625
Horse-drawn Vehicles ... ..	1	30	50	81	2	5	88	—	2	44	46	4	4	54	142
Miscellaneous Vehicles ... ..	—	7	4	11	—	1	12	—	1	8	9	1	2	12	24
<b>GRAND TOTAL ... ..</b>	<b>19</b>	<b>1,644</b>	<b>3,234</b>	<b>4,897</b>	<b>163</b>	<b>403</b>	<b>5,463</b>	<b>—</b>	<b>195</b>	<b>3,301</b>	<b>3,496</b>	<b>196</b>	<b>457</b>	<b>4,149</b>	<b>9,612</b>

\* Mainly steam wagons.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

B.2.—Statement showing the total number of drivers involved in accidents, analysed to indicate the class of vehicle concerned and sex, experience and age group of the drivers.

Sex and Experience.	Age Group.	Built-up Areas.										Areas not Built-up.										GRAND TOTAL.
		Mechanically-propelled Vehicles.						Pedal Cycles.	Horse-drawn Vehicles.	Miscellaneous Vehicles.	Total.	Mechanically-propelled Vehicles.						Pedal Cycles.	Horse-drawn Vehicles.	Miscellaneous Vehicles.	Total.	
		Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total—Mechanically-propelled Vehicles.					Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total—Mechanically-propelled Vehicles.					
Male: (excluding public service vehicles) experienced driver.	Under 18 years ...	7	12	—	3	—	22	227	—	—	251	3	7	—	—	—	10	132	3	—	148	399
	18 years but under 21 years ...	86	97	4	76	—	263	105	—	—	368	53	123	2	53	—	231	74	4	—	309	677
	21 " " 26 " ...	243	283	27	313	8	874	95	9	—	978	168	371	5	187	3	734	102	5	—	841	1,819
	26 " " 31 " ...	263	150	26	304	11	754	62	11	3	830	198	214	7	218	4	641	44	7	—	692	1,522
	31 " " 41 " ...	406	105	86	326	19	942	75	15	2	1,034	292	167	13	170	9	651	72	10	3	736	1,770
	41 " " 51 " ...	255	40	57	121	13	486	69	13	5	573	225	72	10	55	11	373	74	6	3	456	1,029
	51 " " 61 " ...	110	16	26	38	4	194	63	23	—	280	109	33	4	10	—	166	76	4	2	238	518
	61 " " 71 " ...	27	6	9	2	—	44	35	11	1	91	41	7	1	3	—	52	44	5	—	101	192
	71 and over ...	4	—	3	—	—	7	11	2	—	20	5	2	—	—	—	7	11	7	—	25	45
	Age not reported ...	—	—	2	1	—	3	1	—	—	4	1	—	—	1	—	2	1	—	—	3	7
Total ...	1,401	709	240	1,184	55	3,589	743	86	11	4,429	1,095	996	42	697	27	2,857	630	51	11	3,549	7,978	
Male: (excluding public service vehicles) inexperienced driver (i.e., licensed less than six months).	Under 18 years ...	7	8	—	5	—	20	25	—	—	45	2	6	—	—	—	8	11	1	—	20	65
	18 years but under 21 years ...	8	28	1	11	—	48	2	—	—	50	7	27	—	4	—	38	1	—	—	39	89
	21 " " 26 " ...	5	42	—	7	—	54	—	—	—	54	5	38	—	4	—	47	—	—	—	47	101
	26 " " 31 " ...	6	12	—	2	—	20	—	—	—	20	4	10	—	2	—	16	1	—	—	17	37
	31 " " 41 " ...	9	7	—	9	—	25	1	—	—	26	2	16	—	1	—	19	—	—	—	19	45
	41 " " 51 " ...	5	4	—	1	—	10	—	—	—	10	2	5	—	—	—	7	1	—	—	8	18
	51 " " 61 " ...	3	2	—	—	—	5	—	—	—	5	3	—	—	—	—	3	—	—	—	3	8
	71 years and over ...	1	—	—	—	—	1	—	—	—	1	—	—	—	—	—	—	—	—	—	—	1
Total ...	44	103	1	35	—	183	28	—	—	211	25	102	—	11	—	138	14	1	—	153	364	
Male: (excluding public service vehicles) inexperienced with type of vehicle in use at time.	Under 18 years ...	—	3	—	—	—	3	15	—	1	19	1	2	—	—	—	3	13	—	—	17	26
	18 years but under 21 years ...	—	5	—	1	—	6	2	—	—	8	1	4	—	—	—	5	—	—	—	5	13
	21 " " 26 " ...	1	6	—	1	—	8	1	—	—	9	—	4	—	1	—	5	1	—	—	6	15
	26 " " 31 " ...	3	1	—	1	—	5	1	—	—	6	3	1	—	1	—	5	—	—	—	5	11
	31 " " 41 " ...	1	2	—	—	—	3	—	—	—	3	3	4	—	—	—	7	—	—	—	7	10
	41 " " 51 " ...	—	2	—	1	—	3	—	—	—	3	1	1	—	—	—	2	1	—	—	3	6
	51 " " 61 " ...	—	—	—	—	—	—	—	—	—	—	—	1	—	—	—	1	—	—	—	2	2
Total ...	5	19	—	4	—	28	19	—	1	48	9	17	—	2	—	28	16	—	1	45	93	





FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

B.2. (continued)—Statement showing the total number of drivers involved in accidents, analysed to indicate the class of vehicle concerned and sex, experience and age group of the drivers.

Sex and Experience.	Age Group.	Built-up Areas.										Areas not Built-up.										GRAND TOTAL.
		Mechanically-propelled Vehicles.						Pedal Cycles.	Horse-drawn Vehicles.	Miscellaneous Vehicles.	Total.	Mechanically-propelled Vehicles.						Pedal Cycles.	Horse-drawn Vehicles.	Miscellaneous Vehicles.	Total.	
		Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total—Mechanically-propelled Vehicles.					Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total—Mechanically-propelled Vehicles.					
All female drivers ...	Under 18 years ...	1	—	—	—	—	1	31	—	—	32	1	—	—	—	—	1	34	—	—	35	67
	18 years but under 21 years ...	13	—	—	—	—	13	15	—	—	28	9	1	—	—	—	14	14	—	—	23	51
	21 " " 26 " " ...	19	—	—	—	—	19	9	—	—	28	12	1	—	—	—	13	13	—	—	26	54
	26 " " 31 " " ...	18	2	—	—	—	20	10	—	—	30	15	4	—	—	—	19	7	—	—	26	56
	31 " " 41 " " ...	23	1	—	—	—	24	5	1	—	30	26	—	—	—	—	26	11	—	—	37	67
	41 " " 51 " " ...	29	—	—	—	—	29	6	—	—	35	27	3	—	—	—	30	5	—	—	35	70
	51 " " 61 " " ...	4	—	—	—	—	4	1	1	—	6	6	—	—	—	—	6	5	—	—	11	17
	61 " " 71 " " ...	3	—	—	—	—	3	2	—	—	5	2	—	—	—	—	2	1	—	—	3	8
	Total ...	110	3	—	—	—	113	79	2	—	194	97	9	—	—	—	106	90	—	—	196	390
Sex not reported ...	Age not reported ...	8	1	1	3	—	13	5	—	—	18	2	—	—	3	2	7	1	2	—	10	28
All drivers ...	Under 18 years ...	15	23	—	8	—	46	298	2	1	347	7	15	—	—	—	22	190	4	4	220	567
	18 years but under 21 years ...	107	130	5	88	—	330	124	—	—	454	69	155	3	57	—	284	69	4	—	377	831
	21 " " 26 " " ...	268	331	68	321	8	996	105	9	—	1,110	185	414	35	192	3	829	116	5	—	950	2,060
	26 " " 31 " " ...	290	165	174	307	11	947	73	11	3	1,034	220	229	63	221	4	737	52	7	—	796	1,830
	31 " " 41 " " ...	439	115	338	335	19	1,246	81	16	2	1,345	323	187	93	171	9	783	63	10	3	879	2,224
	41 " " 51 " " ...	289	48	155	123	13	626	75	13	5	719	253	81	38	55	11	440	81	6	3	530	1,249
	51 " " 61 " " ...	117	18	49	38	4	226	64	24	—	314	118	34	5	10	—	167	82	4	2	255	569
	61 " " 71 " " ...	30	6	9	2	—	47	37	11	1	96	43	7	1	3	—	54	45	5	—	104	200
	71 years and over ...	5	—	3	—	—	8	11	2	—	21	5	2	—	—	—	7	11	7	—	25	46
	Age not reported ...	8	1	4	—	—	17	6	—	—	23	3	—	—	4	2	9	2	2	—	13	36
	GRAND TOTAL ...	1,568	835	805	1,226	55	4,489	874	88	12	5,463	1,228	1,124	238	713	29	3,332	751	54	12	4,149	9,612

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

B.3.—Statement showing the personal condition and physical defects of all drivers involved in accidents.

		Built-up Areas.									Areas not Built-up.									GRAND TOTAL.		
		Mechanically Propelled Vehicles.						Pedal Cycles.	Horse-drawn Vehicles.	Miscellaneous Vehicles.	Total.	Mechanically Propelled Vehicles.						Pedal Cycles.	Horse-drawn Vehicles.		Miscellaneous Vehicles.	Total.
		Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total—Mechanically-propelled Vehicles.					Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total—Mechanically-propelled Vehicles.					
Personal Condition ...	Ill ...	1	2	—	2	—	5	7	—	—	12	4	1	—	1	1	7	6	—	—	13	25
	Under influence of drink or drugs.	9	—	1	5	—	15	1	—	—	16	6	3	1	3	—	13	2	—	—	15	31
	Asleep ...	—	—	—	1	—	1	—	—	—	1	3	—	—	3	—	6	—	—	—	6	7
	Fatigued ...	—	1	—	3	—	4	2	—	—	6	3	1	1	5	—	10	1	—	—	11	17
	Not known ...	8	1	2	3	—	14	5	—	—	19	2	—	—	4	1	7	1	2	—	10	29
	Apparently normal ...	1,550	831	802	1,212	55	4,450	859	88	12	5,409	1,210	1,119	236	697.	27	3,269	741	52	12	4,094	9,503
	TOTAL ...	1,568	835	805	1,226	55	4,489	874	88	12	5,463	1,228	1,124	238	713	29	3,332	751	54	12	4,149	9,612
Physical Defects ...	Blind in one eye ...	4	—	2	3	—	9	3	—	—	12	1	4	—	—	—	5	5	—	—	10	22
	Only one arm ...	3	—	—	—	—	3	—	—	—	3	—	—	—	—	—	—	—	—	—	—	3
	Only one leg ...	1	3	—	—	—	4	—	1	—	5	1	2	—	—	—	3	1	—	—	4	9
	Deaf ...	4	1	1	1	—	7	12	—	—	19	4	4	1	2	—	11	16	—	—	27	46
	Generally infirm ...	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1
	Disability other than above...	7	8	1	3	—	19	13	—	1	33	8	12	—	2	—	22	14	1	—	37	70
No known defect ...	1,550	823	801	1,219	55	4,448	846	87	11	5,392	1,214	1,102	237	709	29	3,291	715	52	12	4,070	9,462	
	TOTAL ...	1,568	835	805	1,226	55	4,489	874	88	12	5,463	1,228	1,124	238	713	29	3,332	751	54	12	4,149	9,612

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

B.4.—Statement showing the total number of drivers of mechanically-propelled vehicles involved in accidents analysed, in the case of drivers previously convicted, to show the nature of conviction.

Nature of previous convictions.	Built-up Areas.						Areas not Built-up.						GRAND TOTAL.
	Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total.	Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total.	
Manslaughter or culpable homicide ...	1	—	—	—	—	1	—	—	—	—	—	—	1
Driving under the influence of drink or drugs.	7	1	3	1	—	12	2	1	—	4	—	7	19
Driving under the influence of drink or drugs and dangerous or careless driving.	4	—	3	1	—	8	5	—	—	1	—	6	14
Dangerous or careless driving (including convictions under 1903 Act).	59	13	31	55	—	158	37	16	12	42	1	108	266
Total—Drivers with previous convictions	71	14	37	57	—	179	44	17	12	47	1	121	300
No previous convictions ... ..	1,497	821	768	1,169	55	4,310	1,184	1,107	226	666	28	3,211	7,521
GRAND TOTAL ... ..	1,568	835	805	1,226	55	4,489	1,228	1,124	238	713	29	3,332	7,821

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

B.5.—Statement showing the estimated speed of mechanically-propelled vehicles involved in accidents.

Estimated Speed.	Built-up Areas.						Areas not Built-up.						GRAND TOTAL.
	Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total.	Private Motor Vehicles (other than Motor Cycles).	Motor Cycles.	Public Conveyances.	Motor Vans, Lorries, etc.	Other Mechanically-propelled Vehicles.	Total.	
Not exceeding 10 m.p.h. ... ..	170	64	300	388	47	969	75	44	61	132	19	331	1,300
Exceeding 10 m.p.h. but not exceeding 20 m.p.h. ... ..	638	221	398	633	5	1,895	308	209	99	305	2	923	2,818
Exceeding 20 m.p.h. but not exceeding 40 m.p.h. ... ..	636	277	62	132	—	1,107	644	366	56	146	—	1,212	2,319
Exceeding 40 m.p.h. ... ..	40	54	1	2	—	97	58	62	—	3	—	123	220
Not capable of being estimated ... ..	75	218	24	41	—	358	133	439	15	71	3	661	1,019
Vehicle stationary ... ..	9	1	20	30	3	63	10	4	7	56	5	82	145
<b>TOTAL ... ..</b>	<b>1,568</b>	<b>835</b>	<b>805</b>	<b>1,226</b>	<b>55</b>	<b>4,489</b>	<b>1,228</b>	<b>1,124</b>	<b>238</b>	<b>713</b>	<b>29</b>	<b>3,332</b>	<b>7,821</b>

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.1.—Statement showing the total number of persons killed in accidents.

Classification.	Built-up Areas.							Areas not Built-up.							GRAND TOTAL.
	England (including Monmouthshire).				Wales.	Scotland.	Total, Great Britain.	England (including Monmouthshire).				Wales.	Scotland.	Total, Great Britain.	
	City of London.	Metropolitan Police Area.	Elsewhere.	Total.				City of London.	Metropolitan Police Area.	Elsewhere.	Total.				
Drivers (excluding motor or pedal cyclists)—															
Private Motor Vehicles ... ..	1	12	22	35	—	1	36	—	5	89	94	2	17	113	149
Public Conveyances ... ..	—	2	2	4	—	—	4	—	—	2	2	—	1	3	7
Motor Vans, Lorries, etc. ... ..	—	1	14	15	—	2	17	—	—	34	34	—	4	38	55
Other mechanically-propelled Vehicles ...	—	—	—	—	—	—	—	—	—	2	2	—	1	3	3
Horse-drawn Vehicles ... ..	1	14	13	28	1	1	30	—	2	21	23	2	1	26	56
Miscellaneous Vehicles ... ..	—	—	2	2	—	—	2	—	—	2	2	—	1	3	5
Total ... ..	2	29	53	84	1	4	89	—	7	150	157	4	25	186	275
Motor Cyclists ... ..	—	130	332	462	20	28	510	—	27	635	662	49	87	798	1,308
Pedal Cyclists ... ..	1	199	439	639	20	30	689	—	33	511	544	31	60	635	1,324
Conductors ... ..	—	1	1	2	1	1	4	—	1	2	3	—	—	3	7
Goods Vehicle Attendants ... ..	—	2	8	10	1	3	14	—	—	21	21	2	4	27	41
Passengers (other than pillion passengers)	—	41	93	134	1	9	144	—	11	225	236	9	37	282	426
Pillion passengers ... ..	—	20	45	65	1	2	68	—	3	108	111	9	15	135	203
Persons riding without knowledge of driver	—	6	9	15	2	4	21	—	—	4	4	—	—	4	25
Riders of horses or other animals ... ..	—	1	—	1	—	—	1	—	1	6	7	—	—	7	8
Pedestrians ... ..	14	834	1,470	2,318	84	274	2,676	—	47	633	680	41	120	841	3,517
GRAND TOTAL ... ..	17	1,263	2,450	3,730	131	355	4,216	—	130	2,295	2,425	145	348	2,918	7,134

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.2.—Statement showing the number of motor cyclists killed, analysed in age groups and indicating the nature of the accident.

Age Group.	Built-up Areas.							Areas not Built-up.							GRAND TOTAL.
	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	
16 years and under 21 years ... ..	71	4	—	14	5	3	97	81	8	1	23	9	—	122	219
21 years and under 26 years ... ..	122	5	2	31	16	10	186	181	11	6	41	33	3	275	461
26 years and under 31 years ... ..	72	1	—	19	9	5	106	89	5	7	36	20	—	157	263
31 years and under 36 years ... ..	24	2	1	6	3	—	36	65	1	4	17	14	—	101	137
36 years and under 41 years ... ..	22	2	—	4	1	1	30	28	1	3	4	8	—	44	74
41 years and under 46 years ... ..	16	—	—	2	2	—	20	18	2	—	13	2	1	36	56
46 years and under 51 years ... ..	11	2	—	1	—	—	14	17	1	—	4	2	—	24	38
51 years and under 56 years ... ..	9	1	—	1	1	—	12	12	2	2	2	1	—	19	31
TOTAL—21 years and under 56 years	276	13	3	64	32	16	404	410	23	22	117	80	4	656	1,060
56 years and under 61 years ... ..	2	—	—	1	—	—	3	5	—	—	2	4	—	11	14
61 years and under 66 years ... ..	1	—	1	—	1	—	3	4	—	—	—	1	—	5	8
66 years and under 71 years ... ..	2	—	—	1	—	—	3	1	1	—	—	—	—	2	5
71 years and under 76 years ... ..	—	—	—	—	—	—	—	2	—	—	—	—	—	2	2
TOTAL—56 years and over ... ..	5	—	1	2	1	—	9	12	1	—	2	5	—	20	29
GRAND TOTAL ... ..	352	17	4	80	38	19	510	503	32	23	142	94	4	798	1,308

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C. 3.—Statement showing the number and sex of pedal cyclists killed, analysed in age groups and indicating the nature of the accident.

Sex and Age Group.	Built-up Areas.										Areas not Built-up.										GRAND TOTAL.
	Collision between moving vehicles.				Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	TOTAL.	Collision between moving vehicles.				Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	TOTAL.	
	Involving pedal cycles only.	Involving mechanically-propelled vehicles.	Involving horse-drawn vehicles.	Total.							Involving pedal cycles only.	Involving mechanically-propelled vehicles.	Involving horse-drawn vehicles.	Total.							
<b>MALE.</b>																					
Under 16 years:—																					
Under 6 years	—	2	—	2	—	—	—	—	—	2	—	—	—	—	—	—	—	—	—	2	
6 years and under 11 years	1	18	—	19	—	—	—	1	—	20	—	16	—	16	—	—	1	1	—	18	
11 " " 16 "	—	114	1	115	—	—	3	7	4	129	—	52	1	53	—	—	4	7	—	64	
Total	1	134	1	136	—	—	3	8	4	151	—	68	1	69	—	—	5	8	—	82	
16 years and under 56 years:—																					
16 years and under 21 years	3	94	2*	99	4	—	3	7	1	119	—	73	1	74	6	1	4	7	2	94	
21 " " 26 "	1	60	—	61	1	—	3	1	2	68	1	57	—	58	7	1	6	6	1	79	
26 " " 31 "	1	40	—	41	2	—	2	1	2	48	—	28	—	28	1	—	3	2	1	35	
31 " " 36 "	1	33	—	34	—	—	2	1	—	35	1	26	—	27	2	—	3	5	1	38	
36 " " 41 "	—	27	—	27	1	—	1	2	—	31	—	17	—	17	—	1	4	3	—	25	
41 " " 46 "	—	27	—	27	2	—	1	4	1	35	—	27	—	27	3	—	2	2	—	34	
46 " " 51 "	1	23	—	24	—	—	1	1	—	25	2	29	—	31	—	—	2	3	2	38	
51 " " 56 "	—	21	—	21	1	—	—	—	1	23	—	28	—	28	1	1	4	5	—	39	
Total	7	325	2	334	11	—	15	17	7	384	4	285	1	290	20	4	28	33	7	382	
56 years of age and over:—																					
56 years and under 61 years	2	31	—	33	1	—	1	3	—	38	2	29	—	31	—	1	—	4	1	37	
61 " " 66 "	1	16	—	17	—	—	—	1	—	18	—	21	—	21	1	1	1	5	—	29	
66 " " 71 "	—	16	—	16	—	—	—	—	—	16	—	13	—	13	—	—	—	1	—	14	
71 " " 76 "	—	6	—	6	—	—	—	1	—	7	—	2	—	2	1	—	—	5	—	8	
76 " " 81 "	—	4	—	4	—	—	—	—	—	4	—	2	—	2	—	—	—	1	—	3	
Total	3	73	—	76	1	—	1	5	—	83	2	67	—	69	2	2	1	16	1	91	
<b>TOTAL—MALE</b>	<b>11</b>	<b>532</b>	<b>3</b>	<b>546</b>	<b>12</b>	<b>—</b>	<b>19</b>	<b>30</b>	<b>11</b>	<b>618</b>	<b>6</b>	<b>420</b>	<b>2</b>	<b>428</b>	<b>22</b>	<b>6</b>	<b>34</b>	<b>57</b>	<b>8</b>	<b>555</b>	



		FEMALE																					
Under 16 years :—																							
Under 6 years ... ..		—	2	—	2	—	—	—	—	—	2	—	2	—	2	—	—	—	—	—	—	2	4
6 years and under 11 years ...		—	18	—	18	—	—	—	—	18	—	18	—	18	—	—	—	—	—	—	1	14	32
11 " " 16 " ...		—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total ... ..		—	20	—	20	—	—	—	—	20	—	15	—	15	—	—	—	—	—	1	—	16	36
16 years and under 56 years :—																							
16 years and under 21 years		—	20	—	20	—	—	—	—	20	1	21	—	22	1	—	1	—	—	—	—	24	44
21 " " 26 " ...		—	7	—	7	—	—	—	1	8	—	7	—	7	—	—	3	—	—	—	—	12	20
26 " " 31 " ...		—	9	—	9	—	—	—	1	10	—	5	—	5	1	—	—	—	—	—	—	7	17
31 " " 36 " ...		—	4	—	4	—	—	—	—	4	—	4	—	4	1	—	—	—	—	—	—	5	9
36 " " 41 " ...		—	1	—	1	—	—	—	—	1	—	4	—	4	—	—	1	—	—	—	—	5	6
41 " " 46 " ...		—	5	—	5	—	—	—	—	5	—	—	—	—	—	—	—	—	—	—	—	5	5
46 " " 51 " ...		—	—	—	—	—	—	—	—	—	—	4	1	5	—	—	—	—	—	—	—	5	5
51 " " 56 " ...		—	1	—	1	—	—	—	—	1	—	1	—	1	1	1	—	—	—	—	—	4	5
Total ... ..		—	47	—	47	—	—	1	1	49	1	46	1	48	4	1	5	4	—	—	62	111	
56 years of age and over :—																							
56 years and under 61 years		—	—	—	—	—	—	—	—	—	—	1	—	1	—	—	—	—	—	—	—	1	1
61 " " 66 " ...		—	2	—	2	—	—	—	—	2	—	—	—	—	—	—	—	—	—	—	—	—	—
66 " " 71 " ...		—	—	—	—	—	—	—	—	—	—	1	—	1	—	—	—	—	—	—	—	1	1
71 " " 76 " ...		—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
76 " " 81 " ...		—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total ... ..		—	2	—	2	—	—	—	—	2	—	2	—	2	—	—	—	—	—	—	—	2	4
TOTAL—FEMALE		—	69	—	69	—	—	1	1	71	1	63	1	65	4	1	5	5	—	—	80	151	
GRAND TOTAL—MALE AND FEMALE		11	601	3	615	12	—	20	31	11	689	7	483	3	498	26	7	39	62	8	635	1,324	

\* 1 collision involved a mechanically-propelled vehicle and a horse-drawn vehicle.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

G.4.—Statement showing the number of pedal cyclists killed, analysed to indicate the nature of the accident and the features of the locality.

Features of Locality.	Built-up Areas.									Areas not Built-up.									GRAND TOTAL.		
	Collision between moving vehicles.				Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving Collision.	Multiple accident.	TOTAL.	Collision between moving vehicles.				Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving Collision.		Multiple accident.	TOTAL.
	Involving pedal cycles only.	Involving mechanically propelled vehicles.	Involving horse-drawn vehicles.	Total.							Involving pedal cycles only.	Involving mechanically propelled vehicles.	Involving horse-drawn vehicles.	Total.							
<b>At Road Junctions or Cross Roads :—</b>																					
<b>Controlled :—</b>																					
By police—View open ... ..	—	6	—	6	—	—	—	—	1	7	—	—	—	—	—	—	—	—	—	—	7
" " " obscured ... ..	—	1	—	1	—	—	—	—	—	1	—	—	—	—	—	—	—	—	—	—	1
By traffic signals—View open ... ..	—	4	—	4	—	—	—	—	—	4	—	1	—	—	—	—	—	—	—	—	5
" " " " obscured ... ..	—	1	—	1	—	—	—	—	—	1	—	—	—	—	—	—	—	—	—	—	1
<b>TOTAL—Controlled ... ..</b>	—	12	—	12	—	—	—	—	1	13	—	1	—	1	—	—	—	—	—	1	14
<b>Uncontrolled :—</b>																					
Warning signs—View open ... ..	—	15	—	15	—	—	1	—	—	16	—	11	—	11	—	—	1	3	—	15	31
" " " " obscured ... ..	—	19	—	19	—	—	1	—	—	20	—	30	—	30	—	—	—	—	—	30	50
No warning signs—View open ... ..	1	143	—	144	1	—	2	1	—	148	—	76	1	77	—	—	2	1	—	80	228
" " " " obscured ... ..	2	94	—	96	1	—	1	1	—	99	2	67	—	69	—	—	1	—	—	70	169
<b>TOTAL—Uncontrolled ... ..</b>	3	271	—	274	2	—	5	2	—	283	2	184	1	187	—	—	4	4	—	195	478
<b>TOTAL—AT ROAD JUNCTIONS OR CROSS ROADS</b>	3	283	—	286	2	—	5	2	1	296	2	185	1	188	—	—	4	4	—	196	492
<b>Straight road ... ..</b>	5	248	3	256	7	—	6	15	7	291	2	192	—	194	7	4	8	21	5	239	530
Open road bend (i.e., with good sight line) ... ..	1	40	—	41	1	—	2	7	3	54	—	52	2	54	4	—	2	9	1	70	124*
Blind road bend (i.e., with bad sight line) ... ..	1	8	—	9	—	—	—	—	—	9	1	27	—	28	—	—	4	2	—	34	43
Steep hill with good sight line ... ..	1	9	—	10	2	—	3	6	—	21	2	10	—	12	15	2	10	23	2	64	86*
Steep hill with bad sight line ... ..	—	3	—	3	—	—	4	1	—	8	—	13	—	13	—	1	11	3	—	28	36*
Gradient interfering with view ... ..	—	4	—	4	—	—	—	—	—	4	—	2	—	2	—	—	—	—	—	2	6
Bottleneck ... ..	—	6	—	6	—	—	—	—	—	6	—	2	—	2	—	—	—	—	—	2	8*
<b>GRAND TOTAL ... ..</b>	11	601	3	615	12	—	20	31	11	689	7	483	3	493	26	7	39	62	8	635	1,324

\* Cases in which more than one feature was reported are entered under one feature only. The total number of cases in which the following features were reported was :—

Open road bend ... ..	125	Railway level crossing ... ..	2
Steep hill with good sight line ... ..	90	Excessive camber ... ..	1
Steep hill with bad sight line ... ..	42	Bottleneck ... ..	9

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1938.

C.5.—Statement showing the number of pedal cyclists killed, analysed to indicate the type of cycle and conditions of light.

Type of Pedal Cycle.	Built-up Areas.								Areas not Built-up.						GRAND TOTAL.
	Day-light.	Dusk or semi-darkness.	Dark.					Total.	Day-light.	Dusk or semi-darkness.	Dark.			Total.	
			No street lighting.	Central lighting good.	Central lighting poor.	Side lighting good.	Side lighting poor.				No street lighting.	Side lighting good.	Side lighting poor.		
Bicycle :—															
With red rear light ... ..	1	—	—	—	—	6	1	8	—	2	2	—	—	4	12
With reflector ... ..	433	25	22	15	2	70	23	590	332	27	123	21	30	533	1,123
Without red rear light or reflector ...	43	1	—	—	—	1	—	45	45	2	7	1	1	56	101
Carrying more than one person ...	8	—	—	—	—	1	1	10	8	1	1	—	—	10	20
Tradesman's, with delivery receptacle	20	—	—	—	—	2	—	22	11	1	1	—	1	14	36
Tandem ... ..	1	—	—	—	—	—	—	1	3	1	2	—	—	6	7
Tricycle ... ..	1	—	—	—	—	2	—	3	1	—	—	—	—	1	4
Toy cycle or scooter ... ..	9	—	—	1	—	—	—	10	11	—	—	—	—	11	21
<b>TOTAL ... ..</b>	<b>516</b>	<b>26</b>	<b>22</b>	<b>16</b>	<b>2</b>	<b>82</b>	<b>25</b>	<b>689</b>	<b>411</b>	<b>34</b>	<b>136</b>	<b>22</b>	<b>32</b>	<b>635</b>	<b>1,324</b>

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.6.—Statement showing the number of pedestrians of each sex killed, analysed in age groups and indicating the number killed per 100,000 of the total population in each age group.

Age Group.	Built-up Areas.			Areas not Built-up.			GRAND TOTAL.	Number of pedestrians killed per 100,000 in each age group.		
	Male.	Female.	Male and Female.	Male.	Female.	Male and Female.		Male.	Female.	Total.
Under 5 years	194	102	296	61	33	94	390	14.9	8.1	11.5
5 years and under 10 years	305	201	506	96	46	142	648	21.9	13.7	17.9
10 " " 15 "	63	40	103	22	8	30	133	4.4	2.6	3.5
<b>TOTAL—UNDER 15 YEARS</b>	<b>562</b>	<b>343</b>	<b>905</b>	<b>179</b>	<b>87</b>	<b>266</b>	<b>1,171</b>	<b>13.6</b>	<b>8.0</b>	<b>10.8</b>
15 years and under 20 years	31	14	45	25	15	40	85	3.0	1.5	2.3
20 " " 25 "	26	24	50	18	8	26	76	2.3	1.6	1.9
25 " " 30 "	14	14	28	11	8	19	47	1.4	1.1	1.2
30 " " 35 "	42	14	56	13	9	22	78	3.3	1.3	2.2
35 " " 40 "	27	24	51	20	6	26	77	3.3	1.8	2.4
40 " " 45 "	47	24	71	19	13	32	103	4.8	2.3	3.4
45 " " 50 "	60	35	95	30	14	44	139	6.9	3.2	4.9
50 " " 55 "	77	48	125	30	18	48	173	8.5	4.7	6.5
<b>TOTAL—15 YEARS AND UNDER 55 YEARS</b>	<b>324</b>	<b>197</b>	<b>521</b>	<b>166</b>	<b>91</b>	<b>257</b>	<b>778</b>	<b>3.9</b>	<b>2.1</b>	<b>2.9</b>
55 years and under 60 years	89	83	172	38	14	52	224	11.3	7.8	9.4
60 " " 65 "	128	99	227	36	19	55	282	18.4	11.8	14.9
65 " " 70 "	148	93	241	49	19	68	309	29.5	14.1	21.1
70 " " 75 "	147	105	252	40	15	55	307	43.2	21.3	30.8
75 " " 80 "	120	69	189	39	12	51	240	66.4	23.4	41.0
80 " " 85 "	70	55	125	20	8	28	153	93.8	39.0	59.4
85 years and over	26	18	44	6	3	9	53	89.8	27.9	47.8
<b>TOTAL—55 YEARS AND OVER</b>	<b>728</b>	<b>522</b>	<b>1,250</b>	<b>228</b>	<b>90</b>	<b>318</b>	<b>1,568</b>	<b>27.4</b>	<b>14.6</b>	<b>20.4</b>
<b>GRAND TOTAL</b>	<b>1,614</b>	<b>1,062</b>	<b>2,676</b>	<b>573</b>	<b>268</b>	<b>841</b>	<b>3,517</b>	<b>10.1</b>	<b>5.7</b>	<b>7.8</b>

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.7.—Statement showing the number of pedestrians killed, analysed in age groups and indicating the physical condition of the pedestrian at the time of the accident.

Physical Condition.	Built-up Areas.												Areas not Built-up.												GRAND TOTAL			
	Under 15 years.				15 years and under 61 years.				61 years and over.				Total.	Under 15 years.				15 years and under 61 years.				61 years and over.				Total.		
	Under 5 years.	5 years and under 10 years.	10 years and under 15 years.	Total.	15 years and under 21 years.	21 years and under 41 years.	41 years and under 61 years.	Total.	61 years and under 71 years.	71 years and under 81 years.	81 years and over.	Total.		Under 5 years.	5 years and under 10 years.	10 years and under 15 years.	Total.	15 years and under 21 years.	21 years and under 41 years.	41 years and under 61 years.	Total.	61 years and under 71 years.	71 years and under 81 years.	81 years and over.			Total.	
Ill ...	—	—	—	—	—	3	5	8	6	1	—	7	15	—	—	—	—	—	2	2	4	—	—	—	—	4	19	
Deaf ...	4	3	—	7	—	4	17	21	28	42	16	86	114	—	2	—	2	—	1	1	12	14	13	11	7	31	47	161
Bad Sight ...	2	2	—	4	1	1	20	22	35	27	8	70	96	1	—	—	1	—	1	5	6	2	6	1	9	16	112	
Lame ...	—	1	—	1	—	1	6	7	5	5	3	13	21	—	1	—	1	—	—	2	2	3	3	1	7	10	31	
Generally Infirm...	—	—	—	—	—	1	6	7	30	80	32	142	149	—	—	—	—	—	—	2	2	7	15	9	31	33	182	
Under the influence of Drink or Drugs.	—	—	—	—	—	4	13	17	4	4	—	8	25	—	—	—	—	—	3	9	12	5	2	—	7	19	44	
Deranged—Suicide	—	—	—	—	—	3	4	7	—	—	—	7	7	—	—	—	—	—	4	5	9	1	—	—	1	10	17	
Disability other than above.	—	—	—	—	1	3	11	15	11	31	13	55	70	—	—	—	—	—	—	5	5	4	6	3	13	18	88	
Normal ...	290	500	103	893	55	173	420	648	343	238	57	638	2,179	93	139	30	262	43	87	135	265	91	57	9	157	684	2,863	
<b>TOTAL ...</b>	<b>296</b>	<b>506</b>	<b>103</b>	<b>905</b>	<b>57</b>	<b>193</b>	<b>502</b>	<b>752</b>	<b>462</b>	<b>428</b>	<b>129</b>	<b>1,019</b>	<b>2,676</b>	<b>94</b>	<b>142</b>	<b>80</b>	<b>266</b>	<b>44</b>	<b>98</b>	<b>177</b>	<b>319</b>	<b>126</b>	<b>100</b>	<b>30</b>	<b>256</b>	<b>841</b>	<b>3,517</b>	

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.8.—Statement showing the number of pedestrians killed, analysed in age groups and indicating movement of pedestrian.

Movement of pedestrian.		Built-up Areas.											Areas not Built-up.											GRAND TOTAL.				
		Under 15 years.				15 years and under 61 years.				61 years and over.			Under 15 years.				15 years and under 61 years.				61 years and over.							
Main.	Detail.	Under 5 years.	5 years and under 10 years.	10 years and under 15 years.	TOTAL.	15 years and under 21 years.	21 years and under 41 years.	41 years and under 61 years.	TOTAL.	61 years and under 71 years.	71 years and under 81 years.	81 years and over.	TOTAL.	TOTAL.	Under 5 years.	5 years and under 10 years.	10 years and under 15 years.	TOTAL.	15 years and under 21 years.	21 years and under 41 years.	41 years and under 61 years.	TOTAL.	61 years and under 71 years.	71 years and under 81 years.	81 years and over.	TOTAL.	TOTAL.	
Pedestrian crossing roadway.	Passing behind or in front of a stationary vehicle other than tramcar :																											
	At side of road ... ..	45	78	14	136	8	16	43	67	45	38	10	93	295	9	16	5	30	5	9	23	37	11	9	2	22	89	384
	In centre of road ... ..	—	—	—	—	—	—	3	3	4	3	1	8	11	—	1	—	1	—	—	—	—	—	—	—	—	1	12
	Passing behind or in front of stationary tramcar.	3	13	11	27	7	9	23	39	17	12	4	33	99	—	—	1	1	1	3	1	5	—	1	1	2	8	107
	Slipping or falling ... ..	1	6	2	9	1	7	4	12	13	4	—	17	38	—	1	1	2	1	1	3	5	1	2	1	4	11	49
	Crossing against signal of policeman on duty.	—	—	—	—	1	—	—	1	—	—	—	—	1	—	—	—	—	—	—	—	—	—	—	—	—	—	1
	Crossing in compliance with traffic signal indication.	—	—	—	—	—	—	1	1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1
	Crossing against traffic signal indication	—	1	—	1	1	—	4	5	2	3	1	6	12	—	—	—	—	—	—	—	—	—	—	—	—	—	12
	Pushing cycle or hand vehicle... ..	—	—	1	1	1	—	2	3	—	1	—	1	5	—	—	—	—	1	1	—	2	—	—	—	1	1	8
	Occupant of hand vehicle ... ..	4	—	—	4	—	—	—	—	—	1	—	1	5	2	—	—	2	—	—	—	—	—	—	—	—	2	7
Crossing road otherwise than above ...	44	107	22	173	11	78	242	331	262	253	80	595	1,099	16	23	2	41	6	13	46	65	52	46	10	108	214	1,313	
	Total ... ..	97	203	50	350	30	110	322	462	343	315	96	754	1,566	27	41	9	77	14	27	73	114	64	58	15	137	328	1,894
Pedestrian boarding vehicle.	Boarding stationary tramcar ... ..	—	—	—	—	—	—	3	3	4	1	1	6	9	—	—	—	—	—	—	—	—	—	—	—	—	—	9
	Boarding stationary vehicle, other than tramcar.	—	—	—	—	—	—	—	—	1	—	—	1	1	—	—	—	—	—	—	—	—	—	—	—	—	—	1
	Boarding tramcar in motion ... ..	—	—	—	—	—	—	2	2	—	1	—	1	3	—	—	—	—	—	—	—	—	—	—	—	—	—	3
	Boarding vehicle, other than tramcar, in motion.	—	—	—	—	—	—	3	3	1	2	1	4	7	—	—	—	—	—	1	—	1	—	—	—	—	1	8
	Total ... ..	—	—	—	—	—	—	8	8	6	4	2	12	20	—	—	—	—	—	1	—	1	—	—	—	—	1	21

Pedestrian alighting from vehicle.	Alighting from stationary tramcar ...	—	1	1	2	—	2	8	10	3	2	—	5	17	—	—	—	—	—	—	—	1	1	—	2	2	19		
	Alighting from stationary vehicle, other than tramcar.	1	—	—	1	—	—	—	—	2	3	—	5	6	—	1	—	1	—	—	2	2	—	—	—	—	9		
	Alighting from tramcar in motion ...	—	1	—	1	1	2	6	9	3	2	—	5	15	—	—	—	—	1	—	1	—	—	1	1	2	17		
	Alighting from vehicle, other than tramcar, in motion.	—	—	1	1	2	5	8	15	8	1	—	9	25	—	1	—	1	1	1	2	4	2	1	—	3	33		
	Alighting on offside of vehicle ...	—	—	1	1	—	1	—	1	—	—	—	—	2	—	—	—	—	1	—	1	2	—	—	—	—	4		
	Total ...	1	2	3	6	3	10	22	35	16	8	—	24	65	—	2	—	2	2	2	5	9	3	2	1	6	17	82	
Pedestrian working in roadway.	Employed on road repair, maintenance, etc., (including sweeping, surface tarring, working on mains, cables, etc.).	—	—	—	—	—	2	4	6	5	—	—	5	11	—	—	—	—	—	1	1	2	1	—	—	1	3	14	
	Pointman on duty ...	—	—	—	—	—	1 <sup>a</sup>	—	1	—	—	—	—	1	—	—	—	—	—	1 <sup>b</sup>	1	—	—	—	—	1	2	8	
	Otherwise employed in roadway ...	—	—	—	—	1	3	5	9	1	—	—	1	10	—	—	—	—	—	1	6	7	2	1	—	3	10	20	
	Total ...	—	—	—	—	1	6	9	16	6	—	—	6	22	—	—	—	—	—	2	8	10	3	1	—	4	14	36	
Pedestrian in roadway not crossing or working.	Walking in direction of traffic :—																												
	Footpath available ...	—	—	—	—	3	8	16	27	8	9	—	17	44	1	—	1	2	10	16	20	46	10	6	3	19	67	111	
	No footpath available ...	—	—	1	1	—	1	3	4	3	3	—	6	11	1	1	—	2	3	18	20	41	13	10	6	29	72	83	
	Walking against traffic :—																												
	Footpath available ...	—	—	1	1	—	2	2	4	5	5	—	10	15	—	—	—	—	2	1	4	7	4	5	1	10	17	32	
	No footpath available ...	—	—	—	—	1	—	1	2	—	2	1	3	5	1	1	1	3	—	2	3	5	6	8	1	15	23	28	
	Running or holding on to vehicle ...	6	19	4	29	—	—	—	—	—	1	—	1	30	—	—	2	4	6	—	—	—	—	—	—	—	6	36	
	Playing in roadway ...	26	13	5	44	—	—	—	—	—	—	—	—	44	13	12	4	29	1	—	—	1	—	—	—	—	30	74	
	Running into roadway ...	140	241	26	407	4	13	27	44	15	11	4	30	481	45	75	8	128	2	6	15	23	5	—	—	5	156	637	
	Stepping from kerb or refuge ...	6	8	1	15	3	10	34	47	30	46	17	93	155	1	1	2	4	2	3	6	11	3	7	—	10	25	180	
	Falling from kerb or refuge ...	1	1	1	3	—	2	4	6	1	2	2	5	14	—	—	—	—	—	—	2	2	1	1	—	—	2	4	18
	Pushing cycle or hand vehicle ...	—	1	1	2	4	12	11	27	3	2	—	5	34	—	—	—	—	—	3	9	10	22	3	—	1	4	26	60
	Standing in roadway ...	2	2	—	4	1	1	8	10	4	6	1	11	25	—	2	—	2	3	4	4	11	3	1	1	5	18	43	
	Lying in roadway under the influence of drink or drugs.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1	—	1	—	—	—	1	2	2
	Occupant of hand vehicle ...	3	—	—	3	—	—	—	—	—	—	—	—	3	1	—	—	1	—	—	—	—	1	—	—	—	1	2	5
	Movement other than above ...	3	5	3	11	—	3	5	8	4	1	3	8	27	—	2	—	2	—	4	3	7	1	1	—	—	2	11	38
		Total ...	187	290	43	520	16	52	111	179	73	88	28	189	888	63	96	20	179	26	64	87	177	51	39	13	103	459	1,347
	Pedestrian on footpath, etc.	... ..	11	11	7	29	7	15	29	51	17	10	2	29	109	4	3	1	8	2	2	2	6	5	—	1	6	20	129
		... ..	—	—	—	—	—	—	1	1	1	3	—	4	5	—	—	—	—	—	—	2	2	—	—	—	—	—	2
	Pedestrian's movement not reported.	... ..	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Occupant of House ...		—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1
	GRAND TOTAL ...	298	506	103	905	57	193	502	752	462	428	129	1,019	2,076	94	142	30	266	44	98	177	319	128	100	30	256	841	3,517	

(a) Police officer.

(b) Employee of organisation.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.9.—Statement showing the number of pedestrians killed while crossing the road in built-up areas, analysed in age groups and indicating the presence of tramway track and movement of pedestrian.

	Movement of pedestrian.	Under 15 years.				15 years and under 61 years.				61 years and over.				GRAND TOTAL.
		Under 5 years.	5 years & under 10 years.	10 years & under 15 years.	Total.	15 years & under 21 years.	21 years & under 41 years.	41 years & under 61 years.	Total.	61 years & under 71 years.	71 years & under 81 years.	81 years and over.	Total.	
Roads without tramway track ...	Passing behind or in front of stationary vehicle (other than tramcar) at side of road.	35	63	8	106	5	13	29	47	25	22	7	54	207
	Passing behind or in front of stationary vehicle (other than tramcar) in centre of road.	—	—	—	—	—	—	2	2	3	1	1	5	7
	Slipping or falling ...	1	5	2	8	1	6	3	10	5	1	—	6	24
	Crossing in compliance with traffic signal indications	—	—	—	—	—	—	1	1	—	—	—	—	1
	Crossing against traffic signal indications ...	—	—	—	—	—	—	2	2	2	2	—	4	6
	Pushing cycle or hand vehicle ...	—	—	1	1	—	—	1	1	—	—	—	—	2
	Occupant of hand vehicle ...	2	—	—	2	—	—	—	—	—	1	—	1	3
	Crossing road otherwise than above...	36	70	16	122	7	38	131	176	149	148	52	349	647
Total ...	74	138	27	239	13	57	169	239	184	176	60	419	897	
Roads with tramway track less than 9 ft. 6 ins. from kerb.	Passing behind or in front of stationary vehicle (other than tramcar) at side of road.	1	3	1	5	1	—	5	6	2	2	—	4	15
	Passing behind or in front of stationary vehicle (other than tramcar) in centre of road.	—	—	—	—	—	—	1	1	—	—	—	—	1
	Passing behind or in front of stationary tramcar ...	—	4	3	7	1	1	6	8	3	2	—	5	20
	Slipping or falling ...	—	1	—	1	—	—	1	1	1	—	—	1	3
	Crossing against traffic signal indications ...	—	—	—	—	—	—	—	—	—	1	1	2	2
	Crossing road otherwise than above...	2	8	2	12	1	4	15	20	18	21	7	46	78
Total ...	3	16	6	25	3	5	28	36	24	26	8	58	119	
Roads with tramway track not less than 9 ft. 6 ins. from kerb.	Passing behind or in front of stationary vehicle (other than tramcar) at side of road.	9	10	5	24	2	3	9	14	18	14	3	36	73
	Passing behind or in front of stationary vehicle (other than tramcar) in centre of road.	—	—	—	—	—	—	—	—	1	2	—	3	3
	Passing behind or in front of stationary tramcar ...	3	9	8	20	6	8	17	31	14	10	4	28	79
	Slipping or falling ...	—	—	—	—	—	1	—	1	7	3	—	10	11
	Crossing against traffic signal indications ...	—	1	—	1	1	—	2	3	—	—	—	—	4
	Crossing against signal of policeman on duty ...	—	—	—	—	1	—	—	1	—	—	—	—	1
	Pushing cycle or hand vehicle ...	—	—	—	—	1	—	1	2	—	1	—	1	3
	Occupant of hand vehicle ...	3	—	—	3	—	—	—	—	—	—	—	—	2
	Crossing road otherwise than above...	6	29	4	39	3	36	96	135	95	84	21	200	374
Total ...	20	49	17	86	14	48	125	187	135	114	28	277	550	
All Roads ...	Passing behind or in front of stationary vehicle (other than tramcar) at side of road.	45	76	14	135	8	16	43	67	45	38	10	93	295
	Passing behind or in front of stationary vehicle (other than tramcar) in centre of road.	—	—	—	—	—	—	3	3	4	3	1	8	11
	Passing behind or in front of stationary tramcar ...	3	13	11	27	7	9	23	39	17	12	4	33	99
	Slipping or falling ...	1	6	2	9	1	7	4	12	13	4	—	17	38
	Crossing in compliance with traffic signal indications	—	—	—	—	—	—	1	1	—	—	—	—	1
	Crossing against traffic signal indications ...	—	1	—	1	1	—	4	5	2	3	1	6	12
	Crossing against signal of policeman on duty ...	—	—	—	—	1	—	—	1	—	—	—	—	1
	Pushing cycle or hand vehicle ...	—	—	1	1	1	—	2	3	—	1	—	1	5
	Occupant of hand vehicle ...	4	—	—	4	—	—	—	—	—	1	—	1	5
	Crossing road otherwise than above...	44	107	22	173	11	78	242	331	262	253	60	595	1,099
GRAND TOTAL ...	97	203	50	350	30	110	322	462	343	315	96	754	1,566	



FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

C.10.—Statement showing the number of pedestrians killed whilst walking in roadway in the direction of or against traffic or running into roadway, analysed in age groups with particulars of footpaths available.

Particulars of Footpaths.	Built-up Areas.												Areas not Built-up.												GRAND TOTAL.	
	Under 15 years.				15 years and under 61 years.				61 years and over.				Under 15 years.				15 years and under 61 years.				61 years and over.					
	Under 5 years.	5 years and under 10 years.	10 years and under 15 years.	TOTAL.	15 years and under 21 years.	21 years and under 41 years.	41 years and under 61 years.	TOTAL.	61 years and under 71 years.	71 years and under 81 years.	81 years and over.	TOTAL.	TOTAL.	Under 5 years.	5 years and under 10 years.	10 years and under 15 years.	TOTAL.	15 years and under 21 years.	21 years and under 41 years.	41 years and under 61 years.	TOTAL.	61 years and under 71 years.	71 years and under 81 years.	81 years and over.		TOTAL.
Walking in roadway in direction of traffic.	Footpath available :—																									
Footpath 5 ft. or more in width :—	Good surface, congested ...																									
Good surface, not congested ...	Bad surface, not congested ...																									
Footpath over 3 ft. and under 5 ft. in width :—	Good surface ...																									
Bad surface ...	Footpath 3 ft. or less ...																									
No footpath available for use ...	Total ...																									
Walking in roadway against traffic.	Footpath available :—																									
Footpath 5 ft. or more in width :—	Good surface, congested ...																									
Good surface, not congested ...	Bad surface, not congested ...																									
Footpath over 3 ft. and under 5 ft. in width :—	Good surface ...																									
Bad surface ...	Footpath 3 ft. or less ...																									
No footpath available for use ...	Total ...																									
Running into roadway	Footpath available :—																									
Footpath 5 ft. or more in width :—	Good surface, congested ...																									
Good surface, not congested ...	Bad surface, not congested ...																									
Footpath over 3 ft. and under 5 ft. in width :—	Good surface ...																									
Bad surface ...	Footpath 3 ft. or less ...																									
No footpath available for use ...	Total ...																									

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.  
D.1.—Causes attributed to drivers (excluding pedal cyclists).

Cause.	Built-up Areas.					Areas not Built-up.					GRAND TOTAL.																
	Sole or main cause.					Contributory causes.																					
Collision between moving vehicles.	191	56	23	3	8	221	52	32	8	1	99	320	143	23	3	58	23	8	258	68	14	17	8	107	365	685	
Collision between one vehicle and pedestrian.	1	1	1	1	1	5	1	1	1	1	4	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
Collision with obstruction in carriageway (including stationary vehicle).	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	2	1	1	1	1	1	1	2	4
Accident not involving collision.	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2
Multiple accident.	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2
Total.	191	56	23	3	8	221	52	32	8	1	99	320	143	23	3	58	23	8	258	68	14	17	8	107	365	685	
Collision between moving vehicles.	1	1	1	1	1	5	1	1	1	1	4	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
Collision between one vehicle and pedestrian.	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
Collision with obstruction in carriageway (including stationary vehicle).	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	2	1	1	2	1	5	8	10	16
Accident not involving collision.	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2
Multiple accident.	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2
Total.	191	56	23	3	8	221	52	32	8	1	99	320	143	23	3	58	23	8	258	68	14	17	8	107	365	685	
Collision between moving vehicles.	1	1	1	1	1	5	1	1	1	1	4	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
Collision between one vehicle and pedestrian.	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
Collision between one vehicle and animal.	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
Collision with obstruction in carriageway (including stationary vehicle).	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	2	1	1	2	1	5	8	10	16
Accident not involving collision.	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2
Multiple accident.	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2
Total.	191	56	23	3	8	221	52	32	8	1	99	320	143	23	3	58	23	8	258	68	14	17	8	107	365	685	
TOTAL—BUILT-UP AREAS.	191	56	23	3	8	221	52	32	8	1	99	320	143	23	3	58	23	8	258	68	14	17	8	107	365	685	
TOTAL—AREAS NOT BUILT-UP.	1	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	1	1	3	2	1	2	1	5	8	10	16
GRAND TOTAL.	191	56	23	3	8	221	52	32	8	1	99	320	143	23	3	58	23	8	258	68	14	17	8	107	365	685	



FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

D.2.—Causes attributed to pedal cyclists.

Cause.	Built-up Areas.												Areas not Built-up.												TOTAL—AREAS NOT BUILT-UP.	GRAND TOTAL.									
	Sole or main cause.						Contributory causes.						Sole or main cause.						Contributory causes.																
	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	TOTAL—BUILT-UP AREAS.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.			Collision between one vehicle and animal.	Collision between one vehicle and obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.				
Losing control .. .. .	96	—	—	9	6	1	112	54	3	—	2	3	2	64	176	75	7	1	17	20	2	122	27	1	1	—	—	—	36	170	346				
Skidding, i.e., side slipping .. .	45	1	—	—	7	—	53	15	2	—	—	—	—	21	74	6	—	—	1	6	—	13	6	1	—	—	—	—	11	24	98				
Swerving to avoid danger .. .	20	6	—	1	1	—	28	17	12	—	—	—	—	20	46	14	3	—	—	—	—	17	17	3	—	—	—	—	22	39	87				
.. through negligence .. .	48	1	—	—	1	—	50	11	—	—	—	—	—	11	61	31	—	—	—	—	—	31	6	1	—	—	—	—	8	39	100				
Failing to keep to near side; no white line or refuge present.	13	1	—	—	—	—	14	6	—	—	—	—	—	9	23	22	2	—	1	—	—	26	10	—	—	—	—	—	10	38	59				
Turning to right from main road into side road.	1	—	—	—	—	—	1	—	—	—	—	—	—	—	1	1	—	—	—	—	—	1	—	—	—	—	—	—	—	1	2				
Emerging from side road into main road:—																																			
Turning to right without due care	21	—	—	1	—	—	22	1	—	—	—	—	—	1	23	23	—	—	—	—	—	23	5	—	—	—	—	—	5	28	51				
Crossing main road .. .	1	—	—	—	—	—	1	—	—	—	—	—	—	—	1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1				
At too fast a speed .. .	8	—	—	—	—	—	8	1	—	—	—	—	—	1	9	5	—	—	—	—	—	5	1	—	—	—	—	—	1	6	15				
Failing to see that road was clear.	6	—	—	—	—	—	6	1	—	—	—	—	—	1	7	4	—	—	—	—	—	4	2	—	—	—	—	—	2	6	13				
Applying brakes suddenly .. .	1	—	—	—	—	—	1	—	—	—	—	—	—	—	1	—	—	—	4	—	—	5	—	—	—	—	—	—	1	6	7				
Failing to signal .. .	14	—	—	—	—	2	16	6	—	—	—	—	—	6	22	9	—	—	—	—	—	9	4	—	—	—	—	—	4	13	35				
Riding too many abreast .. .	12	—	—	—	—	—	2	—	—	1	—	—	—	1	3	2	—	—	—	—	—	2	3	—	—	—	—	—	3	5	8				
Holding on to other vehicle .. .	3	—	—	—	1	—	4	—	—	—	—	—	—	—	4	3	—	—	—	—	—	3	—	—	—	—	—	—	—	3	7				
Carrying passenger or luggage on cross bar or handlebars.	2	—	—	—	1	—	3	4	—	—	—	—	—	4	7	1	—	1	—	—	—	3	4	1	1	—	—	—	11	14	21				
Proceeding at excessive speed having regard to conditions.	4	3	—	—	—	—	7	8	—	1	—	—	—	9	16	6	—	—	—	—	—	6	6	1	—	—	—	—	8	14	30				
Ill .. .	1	—	—	1	3	—	5	1	—	—	—	—	—	2	7	1	—	—	5	—	—	6	—	—	—	—	—	—	6	13	13				
Inexperienced .. .	5	—	—	—	—	—	5	11	—	—	—	—	—	11	16	—	—	—	—	—	—	—	8	—	—	—	—	—	9	25	25				
Other apparent errors of judgment or negligence.	129	6	—	4	2	6	147	34	5	—	—	1	1	41	188	76	11	—	3	4	1	95	26	3	—	4	—	—	33	128	316				
GRAND TOTAL .. .	420	18	—	16	22	9	485	173	12	—	4	9	4	202	687	279	24	1	23	40	4	371	125	11	2	13	24	1	176	547	1,234				

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

D.3.—Causes attributed to pedestrians.

Cause.	Built-up Areas.									Areas not Built-up.									TOTAL—AREAS NOT BUILT-UP.	GRAND TOTAL.	
	Sole or main cause.				Contributory causes.					TOTAL—BUILT-UP AREAS.	Sole or main cause.				Contributory causes.						
	Collision between one vehicle and pedestrian.	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Accident not involving collision.	Multiple accident.	Total.		Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Accident not involving collision.	Multiple accident.	Total.	Collision between one vehicle and pedestrian.	Multiple accident.	Total.			
Running into roadway from footpath .. .. .	547	1	4	552	—	56	—	56	608	—	123	—	1	124	13	—	13	137	745		
Walking or running from behind vehicle without due care..	395	—	1	396	1	47	—	49	445	—	98	—	1	99	9	—	9	108	553		
Apparently becoming confused or hesitating in traffic .. .	308	1	1	310	—	104	—	4	108	418	85	—	—	85	22	1	23	108	526		
Apparently risking moving traffic .. .. .	251	—	6	257	—	142	—	1	143	400	60	—	2	62	25	—	25	87	487		
Stepping from kerb or refuge without looking .. .. .	292	—	7	299	—	36	—	—	36	335	37	—	—	38	6	—	6	44	379		
Crossing roadway and slipping or falling .. .. .	22	—	—	22	—	9	1	—	10	32	5	—	—	5	1	—	1	6	38		
Crossing road ; not looking in the direction of oncoming traffic ..	1	—	—	1	—	1	—	—	1	2	—	—	—	—	—	—	—	1	3		
Crossing road ; apparently inattentive to traffic .. .	16	—	—	16	—	4	—	1	5	21	8	—	—	8	1	—	1	9	30		
Boarding or alighting from vehicle without due care .. .	21	37	—	58	—	5	3	—	8	66	2	10	—	12	—	—	—	12	78		
Standing in roadway apparently inattentive to traffic .. .	8	—	—	8	—	4	—	1	5	13	6	—	1	7	3	—	3	10	23		
Walking in roadway, not crossing ; footpath available ; apparently inattentive to traffic.	35	—	—	35	—	11	—	—	11	46	49	—	2	51	21	2	23	74	120		
Playing in roadway .. .. .	40	1	—	41	—	8	—	—	8	49	30	—	—	30	3	—	3	33	82		
Falling from kerb or refuge .. .. .	10	—	—	10	—	3	—	—	3	13	2	—	—	2	1	—	1	3	16		
Deranged—suicide .. .. .	7	—	—	7	—	—	—	—	7	7	10	—	—	10	—	—	—	10	17		
Under the influence of drink or drugs .. .. .	15	1	—	16	—	11	1	—	12	28	15	—	—	15	3	—	3	18	46		
Ill. .. .. .	3	1	—	4	—	9	2	—	11	15	2	—	—	2	2	—	2	4	19		
Physically defective .. .. .	24	—	—	24	—	66	—	1	67	91	10	—	—	10	20	—	20	30	121		
Generally infirm .. .. .	24	—	—	24	—	72	3	—	75	99	9	—	—	9	14	—	14	23	122		
Running and holding on to vehicle .. .. .	16	3	—	19	—	8	—	—	8	27	5	—	—	5	1	—	1	6	33		
Running to board bus ; no footpath .. .. .	—	—	—	—	—	—	—	—	—	—	1	—	—	1	—	—	—	1	1		
Carrying child ; apparently inattentive to traffic .. .	—	—	—	—	—	—	—	—	—	—	1	—	—	1	—	—	—	1	1		
Apparent errors of judgment or negligence other than items above	77	1	2	80	—	18	1	2	21	101	58	—	2	60	6	—	6	66	167		
Total .. .. .	2,112	46	21	2,179	1	614	11	11	637	2,816	1	616	10	9	636	152	3	155	791	3,607	

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

D. 4.—Causes attributed to vehicles or equipment.

Cause.	Built-up Areas.											Areas not Built-up.											TOTAL—AREAS NOT BUILT-UP.	GRAND TOTAL.					
	Sole or main cause.					Contributory causes.						TOTAL—BUILT-UP AREAS.	Sole or main cause.					Contributory causes.											
	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision with obstruction in carriageway (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision with obstruction in carriageway (including stationary vehicle).	Accident not involving collision.	Multiple accident.		Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision with obstruction in carriageway (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.			Collision between one vehicle and animal.	Collision with obstruction in carriageway (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.
Mechanical failure or defective feature of vehicle.*	13	11	6	14	3	47	13	11	4	3	—	31	78	20	5	—	20	52	—	97	6	8	1	9	9	—	33	130	208
Inadequate or no front lights..	6	5	1	—	—	12	8	13	2	—	—	23	35	17	15	1	6	—	39	18	12	2	6	—	4	42	81	116	
Inadequate or no rear light ..	2	—	3	—	—	5	—	—	1	—	1	2	7	1	—	—	8	—	9	5	—	—	—	—	—	14	23	30	
Ineffective reflector or rear lamp on pedal cycle or hand-propelled invalid tricycle.	1	—	—	—	—	1	4	—	—	—	—	4	5	8	—	—	—	—	8	2	1	—	—	—	—	6	11	16	
No reflector or rear lamp on pedal cycle.	—	—	—	—	—	—	—	—	—	—	—	—	—	4	—	—	—	—	4	4	—	—	—	—	—	4	8	8	
Dazzling head or side lights ..	8	4	1	1	1	15	3	3	—	—	—	6	21	22	11	1	2	—	36	11	12	—	2	—	—	26	62	83	
Unattended vehicle running away.	—	2	—	1	—	3	—	1	—	—	—	1	4	—	1	—	—	—	1	—	—	—	—	—	—	—	1	5	
One or more tyres worn smooth	—	—	—	—	—	—	2	4	—	1	1	8	8	1	—	—	1	2	4	4	1	—	2	5	—	12	16	24	
Driver's view obstructed† ..	—	4	—	—	—	4	4	3	—	—	—	7	11	—	1	—	1	—	2	1	1	—	1	—	—	3	5	16	
Broken trace causing horse to bolt.	—	—	—	—	—	—	—	—	2	—	—	2	2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2	
Left-hand steering .. ..	—	—	—	—	—	—	1	—	—	—	—	1	1	—	—	—	—	—	—	—	—	—	—	1	—	1	1	2	
Vehicle overloaded, shifted or defective load.	1	—	—	4	—	5	—	—	1	—	—	1	6	—	—	—	1	1	2	2	—	—	—	1	2	5	7	13	
Vehicle projecting over foot-path, refuge or central island.	—	4	—	—	—	4	—	2	—	—	1	3	7	—	—	—	—	—	—	—	1	—	—	—	—	1	1	8	
Explosion or fire on vehicle due to ignition of fuel.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1	—	1	—	—	1	—	2	—	3	4	4	
Explosion or fire on vehicle due to other causes.	—	—	—	—	—	—	—	1	—	1	—	2	2	—	—	—	—	—	1	—	—	—	—	—	—	—	1	3	
Causes other than above ..	3	—	4	2	1	10	1	1	1	2	1	6	16	5	—	—	1	2	8	1	1	—	1	3	—	6	14	30	
<b>Total .. ..</b>	<b>34</b>	<b>30</b>	<b>15</b>	<b>22</b>	<b>5</b>	<b>108</b>	<b>36</b>	<b>39</b>	<b>9</b>	<b>9</b>	<b>4</b>	<b>97</b>	<b>203</b>	<b>78</b>	<b>33</b>	<b>2</b>	<b>40</b>	<b>59</b>	<b>212</b>	<b>54</b>	<b>37</b>	<b>4</b>	<b>30</b>	<b>22</b>	<b>6</b>	<b>153</b>	<b>365</b>	<b>568</b>	

\* Analysed in detail in following table.

† By equipment, load or obscured windscreen.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

D.5.—Causes attributed to vehicles or equipment—Analysis of mechanical failures or defective features of vehicles.

Mechanical Failure.	Built-up Areas.													Areas not Built-up.													TOTAL—AREAS NOT BUILT-UP.	GRAND TOTAL.															
	Sole or main cause.						Contributory causes.							Sole or main cause.						Contributory causes.																							
	Private motor vehicles (other than motor cycles).	Motor cycles.	Public conveyances.	Motor vans, lorries, &c.	Other mechanically-propelled vehicles.	Pedal cycles.	Horse-drawn vehicles.	Miscellaneous vehicles.	Total.	Private motor vehicles (other than motor cycles).	Motor cycles.	Public conveyances.	Motor vans, lorries, &c.	Other mechanically-propelled vehicles.	Pedal cycles.	Horse-drawn vehicles.	Miscellaneous vehicles.	Total.	Private motor vehicles (other than motor cycles).	Motor cycles.	Public conveyances.	Motor vans, lorries, &c.	Other mechanically-propelled vehicles.	Pedal cycles.	Horse-drawn vehicles.	Miscellaneous vehicles.			Total.														
Tyre or tube : burst, defective or detached.	4	4	-	1	-	1	-	10	1	1	-	-	-	-	-	-	2	12	10	16	-	3	-	-	-	-	2(a)	-	-	31	1	3(b)	-	-	-	-	-	-	-	4	35	47	
Brakes : failure or defective ..	-	2	-	4	-	4	-	10	5	3	1	5	-	10 (c)	-	-	24	34	2	-	4(d)	-	-	-	-	-	9	-	-	15	2	1	1	6	-	-	-	-	-	-	20	35	69
Steering mechanism : failure ..	3	-	-	4	-	-	-	7	-	-	-	-	-	-	-	-	3	10	4	1	3	-	-	-	-	1	-	-	12	-	1	1	1	-	-	-	-	-	-	15	25		
Springs : failure ..	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	1	1	3	1	-	-	-	-	-	-	-	2	-	-	1	-	-	-	-	-	-	-	4	4		
Axle : breakage ..	-	-	-	1	-	-	-	1	-	-	-	-	-	-	-	-	-	1	1	3	1	-	-	-	-	-	-	-	4	-	-	1	-	-	-	-	-	-	-	4	4		
Wheel : detached, collapsed or jammed.	2	1	-	-	-	-	-	3	-	-	-	-	-	-	-	-	3	3	1	1	1	-	-	-	-	3	-	-	5	1	-	-	-	-	-	-	-	-	6	9			
Chain : broken, detached or slipped.	-	1	-	1	-	1	-	3	-	-	-	-	-	-	-	-	3	3	4	-	-	-	-	-	-	2	-	-	6	-	-	6	-	-	-	-	-	-	6	9			
Forks : breakage ..	-	1	-	-	-	1	-	2	-	-	-	-	-	-	-	-	2	2	3	-	-	-	-	-	-	3	-	-	3	-	-	3	-	-	-	-	-	3	5				
Side-car connection : broken or detached.	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-	1	1	3	-	-	-	-	-	-	3	-	-	3	-	2	-	-	-	-	-	2	3	6				
Light : failure ..	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	1	4	1	2	1	-	-	-	-	-	-	-	4	-	-	4	-	-	-	-	-	4	4				
Engine, transmission or throttle : failure or defect.	1	2	-	-	-	-	-	3	-	1	-	-	-	-	-	-	4	4	4	-	-	-	-	-	-	-	-	5	-	-	5	-	-	-	-	-	3	5	9				
Free wheel out of order ..	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	-	-	-	-	-	1	-	-	1	-	-	-	-	-	1	1					
Back stand dropping down ..	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	-	-	-	-	-	1	-	-	1	-	-	-	-	-	1	1					
Frame bolt fractured, locking gear wheel.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	-	-	-	-	-	1	-	-	1	-	-	-	-	-	-	1	1				
Anchor bolt : breakage ..	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	1	1	1	-	-	-	-	-	-	-	-	1	-	-	1	-	-	-	-	-	1	1					
Trailer draw-bar : broken or defective.	1	-	-	2	-	-	-	3	-	-	-	-	-	-	-	-	3	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	3				
Tailboard detached ..	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	1	-	-	1	-	-	-	-	-	1	2					
Seized bush (bronze bearing front wheel).	-	-	-	1	-	-	-	1	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1				
Rear mudguard stay detached ..	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1				
Step : defective ..	-	-	-	-	-	1	-	1	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1				
Door handle missing inside car, rendering mechanism defective.	1	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1				
Breeching breaking causing horse to lose control of van.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	1	1					
Nature unknown or untraced ..	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	1	2					
GRAND TOTAL ..	12	13	-	14	-	7	1	47	6	5	1	8	-	11	-	-	31	78	17	41	1	15	-	22	1	-	97	4	8	2	8	-	10	1	-	33	130	208					

(a) Includes one case of broken forks.

(b) Includes one case of failure of springs.

(c) Includes one case of burst tyre.

(d) Includes one case of failure of steering mechanism.

(e) Includes one case of loose front wheel.

FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

D.6.—Causes attributed to tramway, road or weather conditions.

Cause.	Built-up Areas.													Areas not Built-up.													TOTAL—AREAS NOT BUILT-UP.	GRAND TOTAL.											
	Sole or main cause.						Contributory causes.							Sole or main cause.						Contributory causes.																			
	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision with obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision with obstruction including stationary vehicle.	Accident not involving collision.	Multiple accident.	Total.	TOTAL—BUILT-UP AREAS.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision with obstruction (including stationary vehicle).	Accident not involving collision.	Multiple accident.	Total.	Collision between moving vehicles.	Collision between one vehicle and pedestrian.	Collision between one vehicle and animal.	Collision with obstruction (including stationary vehicle).			Accident not involving collision.	Multiple accident.	Total.								
<b>Tramway.</b>																																							
Tramcar jumping points or rails	1	—	—	—	—	1	2	—	—	—	—	—	—	2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2			
Tramway track or centre conduit catching wheel of vehicle.	13	—	—	—	3	—	16	9	—	—	—	—	—	12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2			
Tramway track in bad repair	2	—	—	1	—	—	3	—	—	—	—	—	2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
<b>Total</b>	<b>16</b>	<b>—</b>	<b>—</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>21</b>	<b>9</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>14</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>		
<b>Road.</b>																																							
View obscured by blind corner of bend	19	2	—	1	—	1	23	44	7	—	1	53	76	43	—	1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—		
Excessive camber	—	1	—	—	—	—	1	—	1	—	—	2	4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Gradient interfering with view	—	—	—	—	—	—	—	3	—	—	—	1	4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Bottleneck in road	—	—	—	—	—	—	—	2	—	—	—	4	4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Slippery road surface	—	6	—	—	—	—	8	36	32	—	9	2	81	89	7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Road surface in bad repair	2	—	—	—	3	—	5	2	—	—	—	3	8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Projecting manhole	—	—	—	—	—	—	—	1	—	—	—	1	1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Street lighting absent or poor	4	7	—	1	—	—	12	5	48	1	1	2	1	58	70	1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Dangerous hill	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Margin between kerb and tramway track less than nine feet six inches.	—	—	—	—	—	—	—	1	3	—	—	—	4	4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
<b>Total</b>	<b>25</b>	<b>16</b>	<b>—</b>	<b>2</b>	<b>4</b>	<b>2</b>	<b>49</b>	<b>94</b>	<b>93</b>	<b>1</b>	<b>12</b>	<b>5</b>	<b>7</b>	<b>212</b>	<b>261</b>	<b>51</b>	<b>8</b>	<b>1</b>	<b>10</b>	<b>2</b>	<b>—</b>	<b>72</b>	<b>131</b>	<b>40</b>	<b>2</b>	<b>23</b>	<b>25</b>	<b>2</b>	<b>223</b>	<b>285</b>	<b>556</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>		
<b>Weather.</b>																																							
Heavy rain, snow or hail	1	—	—	1	—	—	2	6	30	—	1	1	39	41	4	1	—	2	—	—	—	7	9	9	—	4	2	2	26	33	74								
Fog or mist	3	3	—	5	1	1	13	8	14	—	3	—	26	39	18	4	—	10	2	1	35	19	10	1	4	3	1	38	73	112									
Ice or frost	—	1	—	5	1	—	7	9	7	—	—	2	20	27	8	3	—	5	6	—	22	12	6	—	4	9	1	32	54	81									
Glaring sun	4	—	—	—	—	—	4	1	2	—	1	5	9	3	2	—	—	2	—	7	5	1	—	2	—	—	8	15	24										
Strong wind	1	—	—	—	—	—	1	1	4	—	—	4	5	2	2	—	—	—	—	5	9	7	—	2	—	—	20	25	30										
Heavy rain and strong wind	—	—	—	1	—	—	1	—	2	—	—	3	4	1	—	—	—	—	—	1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—			
Surface of road white with rime frost, same colour as straying sheep.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—		
<b>Total</b>	<b>9</b>	<b>4</b>	<b>—</b>	<b>12</b>	<b>2</b>	<b>1</b>	<b>28</b>	<b>25</b>	<b>58</b>	<b>—</b>	<b>5</b>	<b>4</b>	<b>5</b>	<b>97</b>	<b>125</b>	<b>36</b>	<b>12</b>	<b>—</b>	<b>19</b>	<b>9</b>	<b>1</b>	<b>77</b>	<b>54</b>	<b>33</b>	<b>2</b>	<b>16</b>	<b>16</b>	<b>4</b>	<b>123</b>	<b>202</b>	<b>327</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>—</b>		



## FATAL ROAD ACCIDENTS—GREAT BRITAIN—YEAR 1933.

## D.7.—Causes attributed to passengers, etc., or to animals.

Cause.	Built-up Areas.			Areas not Built-up.			GRAND TOTAL.
	Sole or Main Cause.	Contributory Causes.	All Causes.	Sole or Main Cause.	Contributory Causes.	All Causes.	
Tram or bus conductors, inspectors and mechanics .. .. .	3	—	3	2	—	2	5
Goods vehicle attendants .. .. .	3	1	4	7	2	9	13
Passengers .. .. .	15	3	18	13	1	14	32
Pillion passengers .. .. .	2	—	2	4	—	4	6
Persons riding without knowledge of driver.	21	—	21	4	—	4	25
Riders or leaders of horses .. .. .	2	—	2	—	—	—	2
Man attempting to drag boy off moving vehicle to which he was hanging.	—	1	1	—	—	—	1
Animals .. .. .	35	8	43	60	13	73	116

## D.8.—Causes attributed to Obstructions.

Cause.	Particulars of Light.	Built-up Areas.			Areas not Built-up.			GRAND TOTAL.
		Sole or Main Cause.	Contributory Causes.	All Causes.	Sole or Main Cause.	Contributory Causes.	All Causes.	
Road works—								
Lighted .. .. .	Dusk or semi-darkness .. .. .	—	—	—	—	1	1	1
Unlighted .. .. .	Dark—side lighting good .. .. .	—	—	—	—	1	1	1
	" —no street lighting .. .. .	—	—	—	2	—	2	2
Stationary vehicle—								
Dangerously placed .. .. .	Daylight .. .. .	—	2	2	—	1	1	3
	Dusk or semi-darkness .. .. .	—	—	—	1	—	1	1
	Dark—no street lighting .. .. .	—	—	—	2	6	8	8
	" —side lighting good .. .. .	1	1	2	—	—	—	2
With projecting load .. .. .	Dusk or semi-darkness .. .. .	—	—	—	—	1	1	1
Highway obstructed by fallen tree, loose stone, etc.	Daylight .. .. .	—	—	—	2	—	2	2
	Dusk or semi-darkness .. .. .	—	—	—	2	—	2	2
	Dark—no street lighting .. .. .	—	—	—	3	—	3	3
	" —street lamps extinguished .. .. .	1	—	1	—	—	—	1
Footpath congested or obstructed	Dark—side lighting good .. .. .	—	1	1	—	—	—	1
Telegraph pole or tramway standard inconveniently placed.	Daylight .. .. .	1	—	1	—	1	1	2
	Dark—side lighting good .. .. .	—	1	1	—	—	—	1
Obstruction at side of, but extending over, carriageway.	Daylight .. .. .	—	3	3	—	1	1	4
	Dark—no street lighting .. .. .	—	—	—	1	—	1	1
	" —central lighting poor .. .. .	—	1	1	—	—	—	1
Other obstruction .. .. .	Daylight .. .. .	2	7	9	2	3	5	14
	Dusk or semi-darkness .. .. .	—	1	1	—	—	—	1
	Dark—no street lighting .. .. .	—	—	—	—	1	1	1
	" —central lighting good .. .. .	1	—	1	—	—	—	1
	" —side lighting good .. .. .	—	1	1	—	—	—	1
Total .. .. .	Daylight .. .. .	3	12	15	4	6	10	25
	Dusk or semi-darkness .. .. .	—	1	1	3	2	5	6
	Dark—no street lighting .. .. .	—	—	—	8	7	15	15
	" —central lighting good .. .. .	1	—	1	—	—	—	1
	" —central lighting poor .. .. .	—	1	1	—	—	—	1
	" —side lighting good .. .. .	1	4	5	—	1	1	6
	" —street lamps extinguished .. .. .	1	—	1	—	—	—	1
	GRAND TOTAL .. .. .	6	18	24	15	16	31	55



ROAD AND RAIL TRAFFIC ACT, 1933

SECOND ANNUAL REPORTS  
OF THE  
LICENSING AUTHORITIES  
1935-1936

(Covering the period 1st October, 1935, to  
30th September, 1936)

.....  
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## FOREWORD

The reports of the Traffic Area Licensing Authorities contained in this volume cover the period 1st October, 1935, to 30th September, 1936; the second year of the licensing system established under Part I of the Road and Rail Traffic Act, 1933.

Many applications for carriers' licences came under full investigation for the first time during this period owing to the provisions of sub-sections (2) and (3) of Section 7 of the Act as to "claimed tonnage".

During the initial period of the licensing system attention was mainly focussed on bringing the contents of the Act to the notice of those concerned and on getting the machinery smoothly started. During this year greater attention has been given to enforcing the provisions of the Act, particularly those relating to public safety—e.g., the maintenance of vehicles in a fit and serviceable condition and the limitation of the time for which drivers may remain continuously on duty.

The number of examinations carried out during the year by the Examiners appointed under Section 17 of the Act was in the neighbourhood of 175,000 and as a result 21,010 notices of prohibition were issued where the vehicles inspected were, or were likely to become, unfit for service. Of these notices of prohibition 6,465 were expressed to take effect immediately on issue.

In view of representations made to them as to the provisions of the Act relating to wages and conditions of employment, the Ministers of Labour and Transport jointly appointed a Committee of three independent persons to investigate the position. The Committee consists of Sir James B. Baillie, O.B.E., J.P., LL.D., D.Phil. (Chairman), Sir Gerald Bellhouse, C.B.E. and Mr. John Forster with the following terms of reference:—

"to examine the present position in regard to the regulation of wages and conditions of service of persons employed in connection with the carriage of goods by road (whether in vehicles authorised under A, B or C licences) and to make recommendations as to the action which it is desirable to take".

During the period under review the Minister of Transport further revised and consolidated the Goods Vehicles (Licences and Prohibitions) Regulations. He also, in January, 1936, consolidated the Road and Rail Traffic Act (Exemption) Regulations and later made further Regulations exempting from the licensing provisions of the Act vehicles of the private car type adapted for the carriage of samples only and used by commercial travellers for the purpose of soliciting orders and not for the purpose of advertisement or of the sale or delivery of goods.

In September, 1936, the Minister issued draft Regulations to give effect to the provisions of the Road Traffic (Driving Licences) Act, 1936, as to the issue of provisional licences to applicants for licences to drive heavy goods vehicles. These Regulations also prescribed the classes of vehicles to which such licences might be limited.

Statistical information as to the goods vehicles authorised under Carriers' Licences at 30th April, 1936, was published in November, 1936, in a document entitled "Road and Rail Traffic Act, 1933. Licensing of Goods Vehicles. Statistical Information.". Copies of this publication can be obtained from His Majesty's Stationery Office, or through any bookseller, price 6d.

## NORTHERN TRAFFIC AREA

To the Minister of Transport.

SIR,

### *Road and Rail Traffic Act, 1933.*

In pursuance of the provisions of Section 23 (4) of the Road and Rail Traffic Act, 1933, I have the honour to submit my second Annual Report for the period ended the 30th September, 1936.

### *Consolidation of Position.*

1. During this second year of my administration of Part I of the Act in the Northern Traffic Area, I have sought to consolidate the position that revealed itself after completion of the initial task of bringing within the orbit of the administration all goods vehicles to which the licensing provisions of the Act are applicable. It has also been necessary to ensure, through the technical staff, that the provisions relating to the maintenance of all goods vehicles (whether licensed or unlicensed) in a state of mechanical fitness have been given full effect to, and to enforce the law in relation to these various matters.

The scheme of administrative and office organisation formulated for the purpose of coping with the work during the initial licensing period proved entirely satisfactory, and has substantially been maintained unaltered.

The comparative statement appended below shows in Columns 2 and 3 the position with regard to full currency period licences in force, and vehicles authorised under those licences at the commencement of the period under review (1st October, 1935), and in Columns 4 and 5 the position at the close of the period on the 30th September, 1936. This short summary is set out at the beginning of the report in order to give a bird's-eye view at a glance of the present position as compared with a year ago.

(1) Class of licence.	(2) Current No. of licences 1.10.1935.	(3) No. of vehicles authorised. 1.10.1935.	(4) Current No. of licences. 30.9.1936.	(5) Vehicles authorised 30.9.1936.
"A" ... ..	1,487	4,547	1,448	4,668
"A" Contract ... ..	64	95	149	198
"B" ... ..	1,565	2,284	1,540	2,266
"C" ... ..	6,539	12,782	7,617	14,049
Total ... ..	9,655	19,708	10,754	21,181

The differences between the figures quoted in Column (2) and Column (4) above are accounted for as under:—

	"A" Licences.	"B" Licences.	"C" Licences.
(a) New licences issued ... ..	75	146	1,344
(b) Licences surrendered or lapsed ... ..	114	171	266

Of the licences surrendered and lapsed, 68 Public "A" Carriers' Licences, and 27 Limited "B" Carriers' Licences were surrendered on the grant of applications under Section 11 (3) (b) of the Act (without publication in "Applications and Decisions") in respect of persons who had acquired the businesses of existing licence holders.

The large increase in Private "C" Carriers' Licences would appear to indicate a tendency on the part of traders to provide their own means of motor transport for the carriage of their goods, in preference to relying on other forms of transport. Part of this increase is however accounted for by an increase in the number of applications received immediately following the issue of

identity certificates under the revised Goods Vehicles (Licences and Prohibitions) Regulations, 1936.

The two following tables show the applications for licences and variations received and the manner in which they were dealt with during the period under review.

Table I.—Applications for Carriers' Licences.

Nature of application.	Applications outstanding from previous year..	Applications received during the year 1st Oct., 1935 to 30th Sept., 1936.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ... ..	3	581	19	495	37
Short Term, Section 3 (3) ...	3	27	—	28	1
Contract ... ..	13	113	5	120	—
"B" Licences :—					
Currency Period ... ..	374	1,411	64	1,578	71
Short Term, Section 3 (3) ...	4	11	—	13	1
"C" Licences :—					
Currency Period ... ..	2	1,358	8	1,344	—
Short Term, Section 3 (3) ...	6	57	—	62	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ...	"A": 1	"B": —	"C": 1
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	"A": 68	"B": 27	
Short Term Administrative Licences issued (Section 3 (4)) ...	"A": Nil	"B": Nil	
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... ..	"A": 5	"B": 1	

Table II.—Applications for variation of Carriers' Licences.

Nature of variation.	Applications outstanding from previous year.	Applications received during the year 1st Oct., 1935 to 30th Sept., 1936.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<i>Variations relating to Vehicles.</i>					
"A" Licences—					
Published and dealt with at Inquiry ... ..	59	1,198	50	1,131	26
Published but determined without Inquiry ... ..			20	110	26
Not published ... ..			—	47	—
Not published ... ..			30	974	—
"B" Licences—					
Published and dealt with at Inquiry ... ..	61	656	62	612	16
Published but determined without Inquiry ... ..			4	88	16
Not published ... ..			—	27	—
Not published ... ..			58	497	—
Variation of Conditions attached to "B" Licences ... ..	1	55	4	40	8
"C" Licences ... ..	27	3,278	361*	2,772	—

\* Includes deletions.

*Advice to Carriers.*

2. Notwithstanding the lapse of time since the inauguration of the licensing system, many operators of motor goods vehicles still appear to find difficulty in understanding and complying with its requirements. During the year requests made to the Licensing Authority for advice and assistance have been numerous and 6,914 interviews were recorded.

*Procedure in dealing with Applications.*

3. In seeking to hold the balance between widely divergent interests I have found it increasingly necessary, as time went on, in dealing with Public "A" and Limited "B" Carriers' Licences, to publish applications in "Applications and Decisions" so as to enable me to hear at Public Inquiries those that prove to be of a contentious nature. The noticeable stiffening of the resistance of objectors has had the unfortunate but inevitable effect of slowing down progress at such Inquiries, and during the course of the year I decided not to hear in public any applications for renewal of existing licences, and for variations, which were not the subject of objection. Apart from easing the work at Public Inquiries, this procedure has saved the applicants affected time and expense alike.

It should perhaps be noted in passing that the period covered by this report is a light one, owing to the fact that, as will be understood, the work of dealing with "renewal applications" has been confined in the main to Limited "B" Carriers' Licences.

*Identification of Vehicles Authorised under Private "C" Carriers' Licences.*

4. The Goods Vehicles (Licences and Prohibitions) Regulations, 1936, that were made statutory during the year, introduced *inter alia* an important change relating to the identification of vehicles authorised under Private "C" Carriers' Licences, which necessitated the preparation of approximately 14,000 identity certificates in respect of vehicles authorised in this Area under licences of that category. The display of these identity certificates did not become a statutory requirement until the 1st October, 1936, but the work of preparation was put in hand well in advance and all the certificates were posted to the licence holders before the end of May. Simultaneously with their despatch publicity was given to the issue in practically all the press organs in the Area, and in "Applications and Decisions." The Police Authorities were also advised of the action taken.

*Temporary Replacement of Authorised Vehicles.*

5. Another important regulation made during the year is that which makes provision for the temporary replacement of authorised vehicles (Regulation 15 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936). This regulation, while it has not yet been made extensive use of in this Area—possibly owing to its provisions not yet being widely known—will undoubtedly be of real service to carriers. Fifty-five operators are in possession of "hiring margins" authorised under Public "A" and Limited "B" Carriers' Licences, and I anticipate that in the course of the next licensing period the new regulation will obviate the necessity for renewal of the majority of these hiring allowances, with the consequential expense involved.

*"Applications and Decisions."*

6. During the year under review, 41 issues of "Applications and Decisions", mostly weekly, have been published.

*Public Inquiries.*

7. In order to consider and determine applications for Public "A" and Limited "B" Carriers' Licences, and variations thereof published in "Applications and Decisions", I have held 67 Public Inquiries at the following towns:—

Barnard Castle (1), Berwick (1), Bishop Auckland (1), Carlisle (14), Darlington (6), Durham (2), Hexham (1), Kendal (2), Middlesbrough (1), Morpeth (1), Newcastle (28), Northallerton (2), Penrith (1), South

Shields (1), Stockton-on-Tees (2), Sunderland (1), West Hartlepool (1), Whitehaven (1).

The total number of applications heard at these Public Inquiries was 1,756, the average per sitting being 26.2. This average is lower than that of the initial licensing period, and the lists are at the time of the preparation of this report being further curtailed owing to the increasing opposition of objectors, and the consequent slowing down of the progress of the proceedings already noted. Nevertheless I am pleased to record that the daily Lists were completed on every occasion and the necessity for adjourning applications owing to lack of time did not arise. During the year I found it necessary to grant 337 adjournments, owing to applicants having failed to attend the Inquiries or to their failure to bring sufficient evidence to enable me to proceed with the applications. I adjourned 63 applications in regard to which I took my decision to *avizandum*.

### Objections.

8. The 2,034 objections received during the year were distributed as follows:—

Source of objection.	Total.	Percentage of total.
London and North Eastern Railway Company ...	1,108	54.5
London, Midland and Scottish Railway Company ...	277	13.6
Members of Associated Road Operators Limited ...	542	26.6
Other Road Operators ... ..	107	5.3
Total ... ..	2,034	100.0

The following objections were withdrawn prior to the holding of the relative Public Inquiries:—

"A" Licence applications ... ..	14
"B" Licence applications ... ..	27
"A" Variation applications ... ..	11
"B" Variation applications ... ..	5
Total ... ..	57

The percentage of objections lodged to the total applications received is as follows:—

Category of licence.	Number of objections.	Number of applications.	Percentage objections to applications.
"A" ... ..	254	608	41
"B" ... ..	1,357	1,422	95
"A" Variation ... ..	194	1,198	16
"B" " ... ..	229	656	34

The percentages in the first two categories are calculated on the total applications received, both new and "renewals". Objections are lodged in respect of practically 100 per cent. of new applications. As for "renewal applications", objections are received in respect of approximately 15 per cent. of "A" Licence applications, and 70 per cent. of "B" Licence applications. The small percentage of objections shown in respect of variations is accounted for by the fact that the majority of applications of this class are for the substitution of vehicles with practically no increase in tonnage. These are in the main granted by me without publication in "Applications and Decisions", and without being laid open to objection.

### Revocation or Suspension of Carriers' Licences.

9. I have not found it necessary to revoke or suspend a carrier's licence in pursuance of Section 13 of the Act.



### *Appeals.*

10. During the year two appeals against my decision were lodged with the Appeal Tribunal. One of these was against my refusal to grant an application for a Public "A" Carrier's Licence, and my decision was upheld. The other was against my decision to grant the renewal of a Limited "B" Carrier's Licence, but was subsequently withdrawn.

### *Keeping of Records.*

11. Six applications have been received under Section 16 of the Act for dispensation from the keeping of records, on the grounds that it was not reasonably practicable for the requirements of the Goods Vehicles (Keeping of Records) Regulations, 1935, to be observed. None of these was granted.

### *Wages and Conditions of Employment of Drivers and Statutory Attendants on Motor Goods Vehicles (Section 32).*

12. The difficulties, to which I referred in my last report, still exist in an acute form, and it is commonly recognised that the machinery that has been provided by the Act has not proved adequate to cope with the situation.

As the Committee of Inquiry that was appointed to examine the present position with regard to the scales of wages and conditions of employment is still pursuing its investigations, no detailed observations from me are called for as to the progress of events during the period under review, but I share with my colleagues the keenest anxiety to see a solution reached that will clear the road for my making such progress with the fulfilment of my statutory obligations in this regard as has up to now, to my disappointment, not been found to be possible.

### *Inspection of Goods Vehicles.*

13. Although the standard of general maintenance of goods vehicles is higher than it was a year ago, the reports of my technical staff indicate that there is still room for considerable improvement.

Most types of goods vehicles at present on the market are of sound design and construction, and, provided they are used for the purpose for which they are suited, and are properly maintained and not overloaded, they should give good service.

It has been found that the proportion of defective vehicles among heavy goods vehicles is smaller than among vehicles of a lighter type. Those which are causing most concern are within the 2½ tons unladen weight category. Manufacturers are striving to put large vehicles of this class on the road and advertise them as being capable of carrying exceptional loads; operators are further attracted by the higher speed limit within which such vehicles may be legally operated, with the result that many vehicles of this class are not only overladen but travel at a relatively high speed as compared with the heavier types. A series of checks taken during the last year indicates clearly that such vehicles require close attention by the Vehicle Examiners. With certain makes of vehicles within this category it has proved possible to estimate very closely the percentage that merit prohibition owing to their condition. This figure has usually worked out at about 50 per cent. of the vehicles examined.

During the year 5,617 goods vehicles have been examined, and attention was called to defects in 3,083 cases; 1,333 notices of prohibition were issued (457 of these were expressed to take effect immediately on issue), while 2,930 subsequent examinations were made in order to ensure that defects had been remedied.

The number of vehicles known to have been replaced as a direct result of examination was 320. The total number of examinations made was 8,547.

During the past year four vehicle examination checks were made during the night at Shap, Scotch Corner, Stannington, near Morpeth, and Framwellgate Moor, near Durham, between the hours of 10 p.m. and 6 a.m. The total number of vehicles examined was 129, and 43 were prohibited, six of which were subjected to immediate prohibition. It was found that generally the newer heavy goods

vehicles were in sound condition, and brakes and steering were in good order. The defective vehicles were either the lighter type of under  $2\frac{1}{2}$  tons unladen weight, or older vehicles of a heavy type.

Three vehicle examination checks were made during the day at Stannington, near Morpeth, High Hesket, near Penrith, and Framwellgate Moor, near Durham, between the hours of 9 a.m. and 5 p.m. At the first two mentioned checks all vehicles (totalling 505) that passed the check point were examined and the number prohibited was 171. Of these, 12 were subjected to immediate prohibition. Here again it was found that the lighter type of vehicle showed to disadvantage. At the Framwellgate Moor check, owing to the large number of vehicles passing the check point, selected vehicles were taken passing in one direction; 199 were examined and of these 106 prohibitions were issued, 17 being immediate. Again it was found that the lighter type of vehicle was in a poorer condition of maintenance than the heavier type and in certain makes the proportion of prohibitions was extremely high. This is borne out by reference to the following table which gives comparative data furnished by the day checks.

Total number of vehicles examined (excluding trailers)—690.

	<i>Exceeding <math>2\frac{1}{2}</math> tons.</i>	<i>Not exceeding <math>2\frac{1}{2}</math> tons.</i>
Vehicles examined ... ..	170	520
Prohibited ... ..	62	226
No. of defects on steering ... ..	43	257
No. of defects on brakes ... ..	24	170
Other defects ... ..	128	565

These checks were made in conjunction with the police authorities, who willingly gave every assistance and contributed in large measure to their success. Traffic Examiners were also present to examine drivers' records, &c. It was noticeable that drivers rarely showed any signs of resentment or impatience, even where owing to immediate prohibition the loads were removed, or immediate repairs made, and generally assisted to make the examinations as expeditious as possible. It is considered that this method of "cross-section" examination is far more efficacious than pre-arranged examinations. There is, however, the disadvantage that the purely local vehicles escape the net, as they do not generally travel sufficiently far from town to come within the venue of the check. Among such vehicles are included a large number of "C" operators, and these require particular attention. Such vehicles are used only for distribution of tradesmen's goods, and the owners frequently have little interest in the vehicles until something goes wrong and puts them out of commission.

The latest official report gives the ratio of heavy to light goods vehicles as 1 to 11, whereas the ratio of heavy to light goods vehicles examined during the checks was 1 to 3. It is thus clear that a large number of light vehicles are operated within urban areas only. Other measures will be devised for dealing with this class of vehicle.

From the data obtained from the night and day checks, the conclusion was reached that the day check gives a truer indication of the general condition of goods vehicles. It is also undesirable to prolong the checks over a long period, as the element of surprise tends to lose its effect after two or three hours. It has been found that the news of the check spreads rapidly in each direction over a distance of 50 miles or more, and in many cases drivers make a detour so as to avoid overhaul.

The question of the vehicle within the  $2\frac{1}{2}$  tons unladen weight category is causing my technical staff serious concern, owing to the persistent overloading that is taking place, and it is clear that the rapid deterioration of the mechanical condition of these vehicles is attributable in the main to abuse by overloading, intensified by lack of proper maintenance by the owners.

Seventy-four accidents were investigated during the year, and it was frequently found that two main contributory causes were overloading and lack of maintenance. Unfortunately, a large number of accidents were not investigated, as no adequate information was received with the requisite promptness and the action eventually taken was so belated as to be of little value. If an obligation were placed on goods vehicle operators to report accidents similar to that imposed on public service vehicle operators by Section 70 (1) of the

Road Traffic Act, 1930, so as to enable prompt action to be taken, it is considered that much valuable information would be brought to light that is inevitably lost under existing arrangements.

*Enforcement of the Provisions of the Act.*

14. Close attention has again been devoted during the year to the enforcement of the provisions of the Act and of the Regulations made thereunder. The numerous complaints from the public, and reports from police authorities and from my Traffic Examiners that I have received have indicated clearly that there is need for constant vigilance to enforce compliance with certain aspects of the law, and the Enforcement Section of my office was, therefore, augmented towards the end of the year. This Section now consists of six Traffic Examiners and three clerks, who work under the supervision of one of my senior officers. Three of the Traffic Examiners are stationed at Newcastle-upon-Tyne, whence they proceed as required to different parts of my Area to conduct investigations. A fourth Examiner is stationed at Carlisle; the remaining two it is my intention to post at Darlington and Stockton-on-Tees respectively. The new members of this Section were not fully trained by the end of the year, and the full benefit of their service will not, therefore, be felt until next year.

In my report for the year ended 30th September, 1935, I stated that 39 summonses for various specified offences remained to be decided by the Courts. Convictions have since been recorded in 37 of those cases, and one summons was dismissed. The remaining charge, after further consideration, was not proceeded with.

The number of summonses issued during the year ended 30th September, 1936, by me or by police authorities in collaboration with me, and the results thereof, are shown in the following statement:—

*1st October, 1935, to 30th September, 1936.*

Class of offence.	Number of Summonses issued.	Successful.	Unsuccessful.	Outstanding.
Using goods vehicle without authority of Goods Vehicle Licence ... ..	121	111	4	6
Failing to comply with conditions attached to licence ... ..	44	39	2	3
Failing to keep, carry or produce current driver's records of hours of work, journeys and loads, etc. ... ..	416	374	20*	22
Obstructing Examiner in performance of his duty ... ..	1	1	—	—
Using a prohibited vehicle ... ..	12	12	—	—
Failing to display appropriate means of identification ... ..	14	14	—	—
Failing to notify change of address ... ..	1	1	—	—
Failing to notify disposal of vehicles ... ..	10	10	—	—
Excessive drivers' hours ... ..	264	218	43	3
Driving heavy goods vehicles without licences ... ..	5	5	—	—
Totals ... ..	888	785	69	34

\* Decision reversed on appeal in one case.

An appeal was lodged by the Chief Constable of Middlesbrough after consultation with me, against the dismissal of one charge for failing to cause a driver to keep a current record. In this case, the Magistrates accepted the ingenious contention for the defendant company that as the driver may legally retain his record in respect of a period of 24 hours for seven days before handing it to his employers, the latter could not be held responsible for the driver's failure to keep or to complete a record within a particular period of 24 hours, and that provided the completed record is handed in by the driver within seven days, the licence holder has discharged the onus that is placed upon him by Section 16 of the Road and Rail Traffic Act, 1933, and the Regulations made under that section. The appeal was allowed by the High Court, and the case

was referred back to the Magistrates with the direction that the charge should be found proved. A conviction was subsequently recorded, and a fine was imposed.

I have continued my previous practice of issuing letters of caution to first offenders in certain cases when I have been satisfied, after investigation, that the offences were committed in extenuating circumstances. I have not, however, considered it possible to adopt this course in connection with the use of unauthorised vehicles, and it will be observed that proceedings have been taken in respect of 121 such offences. In 11 of these cases, the vehicles concerned were motor cycle combinations.

The remaining prosecutions were principally in respect of two categories of offences, viz., excessive drivers' hours, and failure to keep or to cause to be kept current drivers' records. The reports and complaints regarding drivers' hours that continue to reach me cause me much concern, and in the interests of the safety of the public and of the drivers concerned, proceedings have been taken in all cases in which satisfactory evidence has been obtained. The number of summonses issued for such offences during the year was 264, of which 218 were successful, three remain to be heard, and 43 were unsuccessful. Twenty of the 44 charges of failing to comply with conditions attached to licences were also in respect of drivers' hours. The unsuccessful cases were practically all disposed of in five groups, in respect of which the Magistrates decided to accept explanations by the defendants that the apparent offences were due to omissions to show rest intervals, or to unavoidable delays that were not within the knowledge of the prosecution.

In view of this experience, my Traffic Examiners now afford drivers and their employers the opportunity to make voluntary statements in explanation of apparent drivers' hours offences. The excuse that a tea or lunch interval was taken but not entered in the record is very frequently offered, and unless there is definite evidence, apart from the driver's record, of a contravention of Section 19 of the Road Traffic Act, 1930, proceedings have been taken in such instances for failure to keep or to cause to be kept current records. This accounts for the fact that the number of summonses issued for offences of this category represents nearly 50 per cent. of the total number of summonses issued, notwithstanding that my Examiners have reported a considerable improvement, since I submitted my last annual report, in the general standard of record keeping.

There appears still to exist an erroneous impression among owner-drivers of vehicles authorised by Private "C" Carriers' Licences that they are exempt from the need to keep records when driving their vehicles in connection with their businesses, and proceedings have been taken in a number of cases of this kind, partly with a view to obtaining publicity in the press regarding the statutory obligations of such licence holders.

Traffic Examiners co-operated with the Vehicle Examiners in six of the series of seven general checks on goods vehicles that are referred to elsewhere in this report, and examined the records of the drivers of approximately 800 vehicles. The number of offences detected in the course of these operations was 50, of which 32 were in respect of failure to keep current records, and 10 in respect of excessive drivers' hours. These were dealt with by prosecution or by warnings, according to the circumstances of each particular case.

#### *Licences to Drive Heavy Goods Vehicles.*

15. At the 1st October, 1935, action had not been completed on 2,249 applications for licences to drive heavy goods vehicles that had been received during the previous year, principally from persons who, in view of the provisions of Section 32 of the Road Traffic Act, 1934, did not need to be licensed until after the end of that year. The following statement shows the manner in which these applications and those received during the current year have been disposed of:—

In action, or awaiting action, at 1st October, 1935 ... ..	2,249
Applications received since 1st October, 1935 ... ..	3,117
	5,366

Granted and licences issued ... ..	3,909
Refused ... ..	23
Withdrawn ... ..	1,141
Still in action at 30th September, 1936 ... ..	293
	<hr/>
	5,366

The 3,117 applications received since the 1st October, 1935, include 1,201 applications for renewal of licences granted last year with periods of validity of twelve or more months in accordance with the arrangements made to provide an even spreadover of the licensing work. Those arrangements are practically completed and few licences are now granted for less than the full period of three years.

The reason for refusal in 19 instances was that the applicant had failed to pass the driving test and in four instances that the applicant had not reached the statutory age of 21 years.

No appeals against my decision on any of these applications have been made to Courts of Summary Jurisdiction.

Misconception by applicants as to the classification of the vehicles that they are required to drive was again responsible for the submission of numerous applications that were subsequently withdrawn. Failure of applicants to attend for driving tests accounts for the remainder of the withdrawn applications. In some instances this was stated to be due to inability to obtain a suitable vehicle for the purpose.

The majority of the 293 applications shewn as still in action are awaiting the issue of renewal licences that will not be required until after the 30th September, 1936. The remainder are awaiting the replies of the applicants to requests for further information or the reports upon the driving tests.

Of the 1916 first applications for licences received during the year 649 purported to shew that the applicants were entitled, in pursuance of sub-section 6 of Section 31 of the Act, to receive a licence without being required to pass a driving test. In numerous cases this claim proved on investigation to be ill-founded.

The following statement shews the number of tests of competence to drive heavy goods vehicles that have been conducted by my technical officers during the year, and the results:—

Number of driving tests conducted ... ..	951
Passed at first test ... ..	807
Failed at first test and passed at subsequent test ... ..	113
Failed entirely and licence refused ... ..	19
Awaiting further test ... ..	12

The foregoing figures include tests of 52 applicants who passed, and two who failed to pass dual tests with a view to obtaining both vocational and ordinary driving licences.

In addition to the tests conducted by my Examiners, 256 persons licensed by me during the year were tested and passed by other approved examiners appointed by eight authorities and companies that have been authorised by the Minister of Transport to carry out driving tests of their own employees for the purpose of Section 6 of the Act, and that have received my permission to conduct tests for the purpose of Section 31 of the Act also.

On three occasions during the year licences have been suspended owing to the licensees having been repeatedly convicted for exceeding the authorised speed limit. In two instances the licence was suspended for one month; the holder of one of these licences shortly after the expiration of the period of suspension was again convicted for a similar offence and I decided again to suspend the licence, on this occasion for three months.

Changes of address were notified to my Department during the year by 125 licensees.

*Conclusion.*

16. The work involved in the administration of the Act during the period under review has been onerous, and, although in volume it may appear not to have been so great as that of the initial licensing period, the weight of responsibility has grown steadily greater *pari passu* with the contentious issues that have developed.

Not only has the number of objections against applications for Public "A" and Limited "B" Carriers' Licences steadily increased, but the cases involved, so soon as a question of principle emerges, are fought to a standstill. Difficulties have also arisen by reason of the fact that although the licensing system has now been in operation for over two years, quite a large percentage of operators still apparently fail adequately to appreciate its significance. This is made plain by the large number of applications which I have had to adjourn owing to applicants coming before me at Public Inquiries without being in possession of the necessary evidence to deal with objections.

The Appeal Tribunal have in their decisions given valuable guidance on many matters of principle, which I have found of great assistance in determining applications.

Although full use has been made of the period under review for the purpose of consolidating the position which emerged at the end of the preparatory work, much still remains to be done and in my opinion a considerable time must yet elapse before it can be said that conditions in any way approaching stabilization have been reached.

Despite the energetic measures that have been taken to enforce the provisions of the statute, as is evidenced in the section of the report relating to this subject, many offences continue to be brought to light which reveal a state of affairs within the industry that cannot be regarded as in any degree satisfactory.

The present position in regard to vehicles is somewhat similar. The section of my report which deals with the inspection of goods vehicles indicates that while valuable work has been done in this branch also, the number of prohibitions alone which it has been necessary to impose show very clearly that a large volume of work yet lies ahead of the technical staff.

Nevertheless a definite feeling of optimism exists among many established hauliers who see in the statute effective machinery for the stemming of un-economic competition, and the prospect of better conditions for employers and employees alike as time goes on. It is within my knowledge that as a result of the protection which the Act affords, and the co-ordination which its administration is gradually effecting, rates for the carriage of certain classes of merchandise have shown a definite upward tendency. This I regard as a most satisfactory indication that the aims and purposes of the Act are being gradually achieved.

In terminating my report I would place on record the fact that the recognized Road Operators Associations have been exceedingly helpful to me in matters appertaining to the submission of evidence, and I wish also to express my indebtedness to the various local authorities and public bodies who have assisted me by placing at my disposal suitable accommodation for the holding of Public Inquiries in the various towns I have visited. The police authorities have also continued to give that cordial and helpful co-operation that meant so much to me during my first year of office as Licensing Authority.

Finally I desire to express my sincere appreciation of the services rendered by my Headquarters and Technical Staff in assisting me in my administration of the Act during an active and indeed strenuous year.

I have the honour to be, Sir,

Your obedient Servant,

JOHN MAXWELL,  
Licensing Authority.

## YORKSHIRE TRAFFIC AREA

To the Minister of Transport.

SIR,

1. In accordance with the provisions of Section 23(4) of the Road and Rail Traffic Act, 1933, I have the honour to present my second annual report, covering the period ended 30th September, 1936, as licensing authority for the Yorkshire Traffic Area, the extent of which is set out in the First Schedule to that Act.

2. Sir William Hart, O.B.E., continued to act as deputy licensing authority for this area, as well as for the North Western Traffic Area, until May, 1936, when, having regard to the numerous calls on his services in that area, Sir William was obliged to relinquish his duties here. Needless to say I was sorry to lose the help of so able a colleague. His successor, Mr. Willoughby Bullock, carried on from June until the end of the period covered by this report, when he found himself unable to continue to act as deputy.

### Staff.

3. The number of officers at present employed, excluding the clerk, is 41. The increase of six as compared with my last report was mainly due to the need for strengthening the personnel engaged on the work of enforcing the provisions of the Act and of the Regulations. There has been no change in the technical staff which, as stated in my last report, consists of two certifying officers and seventeen vehicle examiners, whose duties are concerned with the technical examination of public service vehicles as well as of goods vehicles.

### Applications.

4. (a) Details of applications received and disposed of during the year are as follows:—

TABLE I.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.		Applications received during the year.	Applications disposed of during the year.		
	*	†		Withdrawn.	Granted.	Refused.
"A" Licences:—						
Currency Period ... ..	212	90	1,293	91	696	121
Short Term, Section 3 (3)...	13	13	96	8	86	1
Contract ... ..	26	26	281	8	246	8
"B" Licences:—						
Currency Period ... ..	954	828	3,643	157	3,500	128
Short Term, Section 3 (3)...	—	—	52	6	37	2
"C" Licences:—						
Currency Period ... ..	128	128	3,191	39	3,240	—
Short Term, Section 3 (3)...	1	1	52	2	51	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... .. "A": 2 "B": Nil "C": 6

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... .. "A": 33 "B": 11

Short Term Administrative Licences issued (Section 3 (4)) ... .. "A": 27 "B": 63

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations)... "A": 31 "B": 14

\* † See notes on next page.

TABLE II.—Applications for Variation of Carriers' Licences.

Nature of Variation.	Applications outstanding from previous year.		Applications received during the year.	Applications disposed of during the year.		
	*	†		Withdrawn.	Granted.	Refused.
Variations relating to vehicles						
"A" Licences :—						
Published and dealt with at Inquiry ... ..	350	224	2,354	48	296	133
Published but determined without Inquiry... ..				39	388	63
Not published ... ..				53	1,315	—
"B" Licences :—						
Published and dealt with at Inquiry ... ..	139	73	1,067	15	93	26
Published but determined without Inquiry... ..				13	317	31
Not published ... ..				34	526	—
Variation of conditions attached to "B" Licences	41	30	196	29	139	41

\* These figures were shown in the previous report as applications outstanding, and included applications which had been determined but not cleared by the issue of licences or licence variations.

† These figures cover only those applications which had not been determined.

(b) *General remarks on applications.*—In reviewing the year's work as revealed by the foregoing tables, it is necessary to bear in mind the different currency periods of "A", "B" and "C" licences, and the extent to which licence holders were obliged to lodge applications for new licences in substitution for existing licences. A more detailed reference to this aspect of the work is made in the succeeding sub-paragraphs.

In my previous report I had occasion to comment upon the large proportion of applications which were incomplete or incorrect in some respects, thus causing correspondence and undue delay which, in most cases, could have been avoided by a little more diligence on the part of applicants in an understanding of the notes and instructions issued to them. While it is noted that there is some slight improvement in this direction, a better understanding by applicants of what is required of them is expected in the future.

(c) *Objections to applications for licences.*—Practically all applications for "A" and "B" licences (other than those for new licences in substitution for existing licences) and applications for additional tonnage to be specified in "A" and "B" licences have been opposed by the railway companies. It is still the exception rather than the rule for road hauliers to oppose one another. The following analysis of applications published during the year gives some idea of the extent of the opposition thereto:—

Type of Application.	Approximate percentages of objections lodged and pursued.	
	"A" Licences.	"B" Licences.
First applications for licences ... ..	95	81
Applications for new licences in substitution for existing licences :—		
(a) With variation as to vehicles and/or special conditions ...	62	70
(b) Without variation as to vehicles and/or special conditions ...	9	33

The revision, with effect from the 1st May, 1936, of the Third Schedule to The Goods Vehicles (Licences and Prohibitions) Regulations, which is the prescribed form of notice of objection to an application, has undoubtedly been of benefit to applicants. Since objectors are now required to particularise the ground



of objection, applicants are in a position to lead evidence in regard thereto at public inquiries, resulting in fewer adjournments and consequent attendance of applicants and objectors at public inquiries.

(d) *Remarks respecting "A" Licences.*—No public "A" carriers' licences expired before the 30th September, 1936, but the number of applications received during the year includes approximately 950 from existing holders whose current licences expired on or after the 1st October, 1936. The remaining applications comprised a few from persons desirous of entering the road haulage industry, but were mainly cases where established businesses were proposed to be acquired by other persons, or where a change in legal entity was involved. The percentages of refusals and withdrawals in relation to the applications disposed of during the year were 13 and 10 respectively.

Compared with the corresponding figure of 90 for the previous year, the increase in the number of applications for "A" Licences outstanding as at the 30th September, 1936, is mainly due to the receipt, towards the end of the period under review, of a large number of applications for licences in substitution for licences which were expressed to expire on the 30th September, 1936, and on dates during the succeeding three months.

It is worthy of note that compared with the previous period there was an increase of 71 per cent. in the number of applications for "A" Licences where the authorised vehicles were to be used exclusively for the purposes of a contract entered into by the applicant with a person carrying on a trade or business (not being the business of carrying or arranging for the carrying of goods) for the carriage of goods for or in connection with that trade or business during any continuous period of not less than one year. This increase is so much greater than the percentage increases in any other class of licence that it has become necessary to examine the position with a view to ascertaining the cause of the increase.

(e) *Remarks respecting "B" Licences.*—With a maximum currency period of one year for "B" Licences, it became necessary for the whole of the existing licence holders who were desirous of continuing their services to apply for new licences, and the figures for the two periods covered by the annual reports are, therefore, capable of a closer comparison than is possible in the case of applications for "A" Licences.

At the end of the period covered by the first report, there were current 3,209 "B" Licences. Almost a similar number of applications for new licences in substitution for existing licences was received during the year ended the 30th September, 1936. There were, therefore, about 450 additional applications which were received from persons who had not previously held limited "B" carriers' licences. This figure includes applications from prospective new entrants to the industry and also covers a considerable number of applications where established businesses were being taken over, or where only a change in legal entity was involved.

The percentages of refusals and withdrawals in relation to the applications disposed of during the year were 3·4 and 4·1 respectively. In many cases the applicant for a further "B" Licence was unable to prove in evidence that there was a need for him to carry goods for hire or reward to the extent to which he had previously been authorised. Where he could bring satisfactory evidence, the licence was, as a general rule, granted, subject to the special conditions attached to the previous licence, but in some other cases adjustments were made to the conditions under which the vehicles could be used for the carriage of goods for hire or reward. It sometimes happened that applicants and objectors came to agreement prior to the public inquiries, with the result that the application was submitted in a modified form.

From the statistical information relating to the position of the industry as at the 30th April, 1936, it is observed that, apart from the Metropolitan area, the percentage of "B" Licence holders (currency and short term) is lower in the Yorkshire Traffic Area than in any other area, and this is a matter which is also engaging my attention. Cases have come to notice where holders of "A" and "C" Licences have used their vehicles for purposes other than those permitted by the conditions of their licences, and it will be seen from paragraph 15 of this report that convictions have been recorded against a number

of these persons. The opportunity is taken of warning holders of licences that they should satisfy themselves that the licences held cover the use to which the vehicles are put.

(f) *Remarks respecting "C" Licences.*—Because of the three years' currency period of "C" Licences, it was not necessary for any licence holder to make application for a new licence in substitution for his existing licence. In considering the significance to be attached to the receipt of such a large number of applications for "C" Licences, as revealed in the above returns, allowance must be made for the number of cases where it was necessary to surrender current licences because of changes in partnerships, the conversion of partnerships to limited liability companies and the sale of businesses, which in turn necessitated applications for fresh licences by the new users. Applications for new licences have also followed on the tardy realisation by some operators that "C" Licences were required for their vehicles. Such cases were mostly confined to users of one vehicle—not infrequently of the box side-car type—and to small tradesmen in outlying districts. Applications from these sources, together with those consequential upon the general improvement in trade, increased during the period under review. These account largely for the increase in the number of vehicles authorised under "C" Licences, and but little of the increase is due to the transfer of vehicles from "B" Licences to "C" Licences.

It was deemed necessary to draw attention in the previous report to the marked increase in the use for the carriage of goods for or in connection with the trades or businesses carried on by the users of trailers drawn by private cars which have not been constructed or adapted for use for the carriage of goods. Again it is desirable to mention this matter. Cases have occurred where holders of "C" Licences have disposed of their goods vehicles and resorted to the use of private cars and trailers in circumstances in which there is no liability upon them to take out a "C" Licence, and the opinion is held that the use of private cars and trailers by traders is, especially in country districts, on the increase. Moreover, complaints have been received from "A" and "B" Licence holders that such trailers have been used for the carriage of goods for hire or reward, but these complaints have been rare, and no cases have yet arisen where satisfactory evidence has been obtainable to the effect that the goods were so carried. The passage of a further 12 months has strengthened the view that steps should be taken to introduce amending legislation at the earliest opportunity so that control may be exercised over the use of these vehicles. Such amending legislation seems to be desirable in fairness to existing "C" Licence holders, who have certain statutory conditions attached to their licences which they are required to observe. Another reason for the consideration of this matter by the legislature touches upon the vital problem of road safety. Quite apart from the question of any possible abuse of the provisions of Section 1 (7) (b) of the Act, it seems to be undesirable in the interests of the public that there should be an extended user of trailers drawn by private cars.

The issue of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936, dated 26th March, 1936, brought about a change with effect from the 1st October, 1936, in the method of identification of vehicles authorised under "C" Licences. Whereas in the past licence holders had the option of displaying on their vehicles either their name and address or the number of the licence, they are as from the 1st October, 1936, required to affix to each authorised vehicle an identity certificate, which bears a similarity to the identity certificates required to be affixed to vehicles authorised under "A" and "B" Licences. The work of issuing certificates for all authorised vehicles as at the 1st October, 1936, was undertaken during the year, and revealed a high proportion of cases of failure (a) to apply for the variation of licences where changes of vehicles had occurred, (b) to notify changes of address, and (c) to return licences within the required period of five days where licence holders had ceased to be the owners of vehicles specified in the licences. The new regulation will no doubt have the effect of bringing to light cases of failure to apply for licences, but it will be possible to report more fully upon this aspect in the next report.

(g) *Holding companies.*—It will be noted that Table I gives information as to the number of applications during the year from holding companies who had signified their desire that the provisions of Section 12 of the Act should



Harrogate	...	...	...	...	...	...	...	2
Huddersfield	...	...	...	...	...	...	...	4
Hull	...	...	...	...	...	...	...	10
Keighley	...	...	...	...	...	...	...	1
Leeds	...	...	...	...	...	...	...	60
Rotherham	...	...	...	...	...	...	...	11
Sheffield	...	...	...	...	...	...	...	6
Shipley	...	...	...	...	...	...	...	2
Wakefield	...	...	...	...	...	...	...	7
York	...	...	...	...	...	...	...	22

I was occupied at public inquiries on 80 occasions; Sir William Hart, O.B.E., and Mr. Willoughby Bullock acted as the licensing authority on 36 and 28 occasions respectively. The remaining inquiry was conducted in an emergency by Sir John Maxwell, C.M.G., the licensing authority for the Northern Traffic Area.

It is desired to express thanks to those local authorities who have continued to provide accommodation for holding public inquiries.

#### *Evidence at public inquiries.*

7. Since the pronouncements of the Appeal Tribunal on the tendency of applicants to place reliance on the production of letters as evidence in support of their applications, without calling witnesses who could be examined and cross-examined in regard thereto, an improvement in the value of evidence given at public inquiries has been noticeable, e.g., there has been an increased number of certified statements of accounts and tonnage showing reliable data over comparable periods. This is information of the type which is required for other purposes in any well organised business, and it is not unreasonable to expect that applicants who have bona fide cases will resort to its use to an increasing extent. It is not desirable to attempt to say in general terms what unsupported documentary evidence might be acceptable, but it cannot be emphasised too strongly that it is in the interests of applicants to make every possible effort to bring forward documentary and oral evidence which will stand the test of examination and cross-examination.

#### *Rates.*

8. A matter to which reference was made in the last report concerned the question of the stabilisation of rates, and it was then said that as licensing authorities are not endowed with statutory powers in regard to the fixing of rates, the initiative must lie with operators and their associations. There is reason to believe that various bodies representative of road hauliers are applying their energies to this problem; in fact, it is learned that there are at least ten associations and rates committees in the Yorkshire Traffic Area actively engaged in an endeavour to arrive at a solution of this question in their own districts. Because the question of the stabilisation of rates is one of such importance, it is of interest to learn of the movements which are taking place in this direction. "A" and "B" Licence holders will not have overlooked the fact that in the absence of statutory provisions any agreed rates may not be enforceable at law, but where reasonable and economic rates have been agreed upon by a majority of licence holders in any district, the task of proving a case against an operator who has attracted to himself "false" traffic by charging uneconomic rates should not be difficult.

It is appreciated that this question is closely related to the other equally important question of wages and conditions of employment of persons engaged in the road transport industry, to which reference is made at paragraph 17.

#### *Revocation and suspension of licences.*

9. It has not been found necessary to revoke or suspend any licences or to issue, in lieu of such revocation or suspension, any direction under the powers conferred upon me by Section 13 of the Act.

#### *Requests for reasons in writing.*

10. The number of requests by applicants to state in writing under Section 6 (3) of the Act the reasons for decisions is still largely in excess of the

number of appeals lodged against decisions. During the period under review, 75 requests were received, but in 13 instances only was it decided by the applicants to prosecute appeals.

Some applicants have doubtless been deterred, after reading the statements, from presenting their cases to the Appeal Tribunal, and others will have requested written statements for quite good reasons not connected with the question of appeal.

#### *Appeals to the Appeal Tribunal.*

11. The following statement shows the numbers of the various types of appeals made to the Appeal Tribunal and the results of the appeals decided:—

	Out-standing at 30.9.35.		Lodged during year.		Allowed.		Dismissed.		Abandoned.		Out-standing at 30.9.36.	
	"A"	"B"	"A"	"B"	"A"	"B"	"A"	"B"	"A"	"B"	"A"	"B"
Refusal of licence ...	1		3	2	1		2			1	1	1
Grant of licence ...	1		3		2				1		1	
Refusal of variation			9				4		5			
Grant of variation ...	2		20		3		1		2		16	
Special conditions of licences:—												
(a) applicant ...				2						1		1
(b) objector ...				3		1						2
Totals ...	4	—	35	7	6*	1*	7	—	8	2	18	4

\* The orders made by the Tribunal in regard to one appeal on an application for a public "A" carrier's licence and in regard to the appeal against the conditions attached to the limited "B" carrier's licence required the licensing authority to rehear the applications in certain respects.

#### *Dispensations from the keeping of records.*

12. Applications under Section 16 (3) of the Act for dispensations from the keeping of records totalled 62—a third of the number of applications received in the previous year. Only in one case was it proved to my satisfaction that it was not reasonably practicable, having regard to the nature of the business concerned, for the requirement dispensed with to be observed. The application granted was made by the holder of a "B" Licence, and the observance of the requirement dispensed with concerned the column headed "max. weight at any one time" in Section 2 of the forms in the Schedule to the Goods Vehicles (Keeping of Records) Regulations, 1935, as regards two authorised vehicles when used for the carriage of goods for or in connection with the applicant's trade or business only.

#### *Maintenance of goods vehicles.*

13. (a) *General.*—The general policy adopted by the certifying officers, to which reference was made in the first annual report, has been maintained and has continued to produce satisfactory results. The certifying officers report that the condition of goods vehicles throughout the area has continued to improve and that in consequence there has been a decrease in the number of prohibition notices issued. As will be seen from the particulars in sub-paragraph (b), however, the total number of prohibition notices issued is still large, and it is reported that this may be attributed to two reasons:—

(i) There is a number of operators of goods vehicles who apparently fail to appreciate that they have a responsibility to maintain their vehicles in good condition. Frequent visits to these operators need to be paid by vehicle examiners, and it is in respect of these operators' vehicles that a series of prohibition notices has had to be issued.

(ii) Other operators appear to consider vehicle examiners in the light of consulting engineers. These operators are not irresponsible in the sense of those mentioned above, but they apparently think that they have complied with the conditions requiring proper maintenance of their

vehicles if they remedy promptly any defects discovered by a vehicle examiner. So far, it has not been possible to persuade a number of operators in this category that proper maintenance should be independent of inspections by vehicle examiners.

(b) *Number of vehicles examined.*—During the year, 28,409 inspections (compared with 30,283 for the period covered by the first annual report) of goods vehicles have been made, covering 20,388 vehicles. It has been necessary to issue 2,916 notices of prohibition as compared with 5,443 for the previous period. Of the total of 2,916, 478 notices were issued so as to have immediate effect. There have been no appeals to you or to the certifying officers against the refusal of a vehicle examiner to remove a prohibition.

(c) *System of examination.*—While practice has made members of the technical staff skilled in discovering defects when making "spot checks" on the road, it has been found that "spot checks" in themselves are inadequate as a means of carrying out the duties imposed upon certifying officers and vehicle examiners. It has, therefore, been necessary to adopt a system under which vehicles are examined at the owners' premises. All vehicles specified under "B" Licences and the majority of those operated under "A" Licences in the area have been examined in this way and records have been kept showing the ages of the vehicles, the maintenance methods followed by their owners and the condition of the vehicles at the time of examination. The recording system has been so designed that any vehicle the maintenance of which was considered unsatisfactory would be re-examined at definite intervals.

Systematic examinations on the lines outlined above have enabled the certifying officers to bring under notice cases in which it is alleged that operators are failing to comply with the condition of their licences requiring them to maintain the authorised vehicles in a fit and serviceable condition, and a number of warnings has had to be issued to operators when they have appeared at public inquiries in connection with their applications for licences.

The arrangements to be made to enable the examiners to gain access to vehicles when they are not in use necessitate a measure of co-operation on the part of operators, especially as it frequently happens that examinations have to be made on Sundays and early in the morning or late in the evening on week-days. Operators generally are ready and willing to co-operate with the vehicle examiners in this matter.

(d) *Analysis of prohibitions.*—The table below shows how the defects defined on the 2,916 prohibition notices issued in respect of vehicles, the use of which for the carriage of goods was prohibited, were distributed amongst the more important components of the vehicles. It will be observed that steering gear, brakes, suspension springs and bodywork were more frequently defective than other components.

Component.	Total No. of defects in respect of 2,916 prohibition notices.
Steering arms and ball pins ... ..	1,027
Steering column, box and drop arm ... ..	1,313
Steering track rod and drag link ... ..	1,097
Stub axles, king pins and bushes ... ..	855
Suspension springs ... ..	1,230
Spring shackles, pins and bushes ... ..	672
Foot brake ... ..	1,351
Hand brake ... ..	1,549
Road wheels, studs, nuts, etc. ... ..	733
Frames, cross members... ..	538
Rear axle... ..	164
Engine, gear box, clutch, propeller, shaft joints and bearings ... ..	424
Bodywork, mudwings, etc. ... ..	1,599

(e) *Brakes.*—The maintenance of efficient brakes is considered to be of paramount importance, and particular attention has been given to this question by the technical staff. They report that the majority of operators now seem to appreciate that it is their duty to adjust and renovate their brakes, and that

in general there is a decided improvement in braking efficiency, particularly in the case of foot brakes. Nevertheless, during the year under review, it has been found that hand brakes are far too frequently inefficient. This may be due to failure on the part of drivers to use the hand brake as a service brake. Those drivers who use their hand brakes infrequently may not realise when a defect has developed and in consequence do not report the matter to the maintenance staff. In an emergency, arising say from the failure of the foot brake, a hand brake should be in such condition as to be capable of stopping the vehicle, as otherwise the statutory requirement of two independently operated brakes on vehicles becomes valueless. It is not sufficient that a hand brake may be good enough for parking, and drivers should be instructed to make greater use of hand brakes in service if only for the purpose of keeping a regular check on their efficiency.

(f) *New vehicles.*—Throughout the area there has been an extensive replacement of old vehicles by new ones. Last year comment was made upon the tendency to replace older types of vehicles by vehicles with a heavier unladen weight owing to stouter construction and the fitting of twin wheels, tipping gear, steel-lined bodies and Diesel oil engines. Whilst this type of replacement has continued so far as concerns vehicles of the 1-ton and 30-cwt. classes, there has been a marked movement in the replacement of vehicles in the heavier ranges by lighter ones, the majority of the new vehicles, many of British design, having an unladen weight less than 2½ tons.

The road fund licensing system of goods vehicles on an unladen weight basis and the higher speed limit permissible to the lighter type of vehicle are doubtless accountable for the influx of the lighter vehicles—the drivers of which do not moreover need to obtain the additional licence to drive a heavy goods vehicle.

(g) *Overloading.*—It is reported to me that the practice of overloading light goods vehicles still persists in spite of the many steep gradients in the area. Vehicles under 2½ tons unladen weight frequently carry 6 to 7 tons, and may thus become potentially dangerous not only in themselves but to other users of the highway. Dimensions of vital parts of the mechanism are limited by allowable weight, and if these become over-stressed, failure may occur.

Rate cutting may be one of the principal causes of overloading and of inefficient maintenance. Operators who carry goods at uneconomic rates are the more likely to overwork and neglect their vehicles.

(h) *Conversion sets made available by manufacturers.*—Last year it was reported that operators did not appear to take advantage of replacement parts of improved design made available by manufacturers. It is understood that the position has improved—possibly as a result of advice given to operators by the technical staff.

*Drivers' Licences (Heavy Goods Vehicles). Road Traffic Act, 1934,  
Sections 31 and 32.*

14. The initial spreadover of the work of granting licences to drive a heavy goods vehicle, to which reference was made in the last report, was completed in March, 1936. Licences granted on applications received after that date have been expressed to have effect for the full period of three years, except where the applicant was perforce subjected to a driving test on a light goods vehicle, when the currency period has been limited to 12 months. In these cases a further test may be carried out on a heavy goods vehicle if, on the expiration of the licence, a further licence is sought. In the great majority of the cases where no driving test was carried out, the applicant claimed a licence in accordance with the provisions of Section 31 (6) of the Act. Where a licence could not be claimed as a right under that section, the question of the driving test often presented considerable difficulty owing to the fact that an applicant could not be tested on a road with a heavy goods vehicle. The passing of the Road Traffic (Driving Licences) Act, 1936, which provides for the issue of provisional licences, will make it possible for driving tests to be carried out appropriate to the class or classes of heavy goods vehicles which the applicant desires to drive.



Driving tests conducted by members of commercial firms appointed under Regulation 8 (1) of the Motor Vehicles (Driving Licences) Regulations, 1935, are normally accepted for the purpose of tests under Section 31 of the Road Traffic Act, 1934, subject to the person concerned being jointly examined by (or on behalf of) a certifying officer of the area and by the area supervising examiner (driving tests) as to his practical driving capacity and suitability to conduct tests. At present, tests are accepted for the purposes of Section 31 from 10 commercial firms.

Four vocational licences have been granted under arrangements which enable serving soldiers to be tested by the army authorities before the termination of their service.

During the 12 months to which this report relates, 8,248 applications were received which, together with 1,249 applications still in action on the 30th September, 1935, amounted to 9,497. Of this number, 8,730 were granted and licences issued, 19 were refused, 316 were withdrawn, 91 were otherwise disposed of, 40 had been decided and were awaiting the issue of the licence and 301 were outstanding at the 30th September, 1936. One licence was revoked. There were no appeals to courts of summary jurisdiction. Of the refusals, 17 were on account of failure to pass a driving test and two owing to the previous conduct of the applicant in his capacity as a driver of a motor vehicle.

Details of the driving tests carried out are as follows:—

Passed at first test ... ..	1,047
Failed at first test and passed at subsequent test ... ..	49
Awaiting further test ... ..	7
Failed entirely and licences refused ... ..	17
Number of driving tests carried out by area examiners	1,206
Number of applicants tested and passed by persons appointed to conduct tests under Section 6, which tests are accepted for the purposes of Section 31 of the Road Traffic Act, 1934 ... ..	334

12,224 vocational licences to drive a heavy goods vehicle were current on the 30th September, 1936, which number includes two women drivers.

*Enforcement of the provisions of the Act and of the Regulations.*

15. The number of infringements of the Act and of the Regulations is still a matter for some concern, and has necessitated the institution of proceedings in 2,446 cases during the past year as compared with 995 cases mentioned in the previous report. This number is quite apart from the number of 1,304 instituted by chief officers of police, to which reference is made later. All reports of alleged offences need close scrutiny, and in numerous cases where it was felt that such a course was appropriate, the persons concerned have been warned as to their future conduct instead of being prosecuted.

The following statement shows the various classes of offences, etc., in respect of which proceedings have been instituted:—

Offence.	Number of charges made.	Number of convictions secured.	Number of charges dismissed.	Number of charges pending.
<i>Offences against the Road and Rail Traffic Act, 1933.</i>	.			
Using a vehicle except under a licence ... ..	617	568	4	45
Failure of drivers to keep current records ... ..	734	656	10	68
Failure of licence holders to cause current records to be kept ... ..	491	413	9	69
Failure of drivers to produce records when required to do so... ..	80	72	—	8
Failure of drivers to deliver records to licence holders ... ..	13	13	—	—
Failure of drivers to carry current records ... ..	28	26	2 (a)	—
Failure of drivers to sign records kept by them ... ..	1	1	—	—
Failure of licence holders to produce records to be preserved by them ... ..	1	1	—	—
Using a vehicle authorised under an "A" licence for the carriage of goods in connection with the licence holder's own business ... ..	5	5	—	—
Breach of special conditions attached to "B" licence ... ..	6	3	1	2

(a) (b) (c) See notes overleaf.



Offence.	Number of charges made.	Number of convictions secured.	Number of charges dismissed.	Number of charges pending.
<i>Offences against the Road and Rail Traffic Act, 1933—cont.</i>				
Using for hire or reward a vehicle authorised under a "C" licence ... ..	44	37	2 (b)	5
Driving a vehicle whilst a prohibition was operative ... ..	3	3	—	—
Causing a vehicle to be driven whilst a prohibition was operative ... ..	12	9	—	3
Offences in making application or using documents with intent to deceive ... ..	10	8	1	1
<i>Offences against The Goods Vehicles (Licences and Prohibitions) Regulations.</i>				
Failure to display identity certificate ... ..	95	80	3	12
Failure of licence holder to notify change of address ... ..	5	5	—	—
Failure to notify change of ownership of an authorised vehicle ... ..	21	15	1	5
<i>Offences against the Road Traffic Act, 1930.</i>				
Driving in excess of the hours permitted by Section 19 of the Act ... ..	69	43	—	26
Permitting an employee to drive in excess of the hours permitted by Section 19 of the Act ...	79	55	2	22
<i>Offences against the Road Traffic Act, 1934.</i>				
Driving a heavy goods vehicle when not licensed for the purpose ... ..	74	64	—	10
Employing an unlicensed person to drive a heavy goods vehicle ... ..	57	50	—	7
<i>Offences against The Perjury Act, 1911.</i>				
Knowingly making a false statement in a record	1	—	1 (c)	—
	2,446	2,127	36	283

(a) Of these cases, which were heard on the same day, one was referred to the Divisional Court, who ordered the justices to find the defendant guilty.

(b) These cases were referred to the Divisional Court, but the decision was not available at the end of the period covered by the report.

(c) The defendant was committed to the assizes, where he was found not guilty.

The police authorities have instituted proceedings in connection with similar offences, and the following statement reveals the cases which have been reported by chief officers of police:—

Offence.	Number of charges made.	Number of convictions secured.	Number of charges dismissed.
<i>Offences against the Road and Rail Traffic Act, 1933.</i>			
Using a vehicle except under a licence ... ..	17	17	—
Failure of drivers to keep current records ... ..	770	764	6
Failure of licence holders to cause current records to be kept	209	203	6
Failure of drivers to produce records when required to do so	33	33	—
Failure of drivers to deliver records to licence holders ...	18	18	—
Failure of drivers to carry current records ... ..	32	32	—
Using for hire or reward a vehicle authorised under a "C" licence ... ..	1	1	—
Offences in making application or using documents with intent to deceive ... ..	2	2	—
<i>Offences against The Goods Vehicles (Licences and Prohibitions) Regulations.</i>			
Failure to display identity certificates ... ..	43	43	—
<i>Offences against the Road Traffic Act, 1930.</i>			
Driving in excess of the hours permitted by Section 19 of the Act ... ..	51	49	2
Permitting an employee to drive in excess of the hours permitted by Section 19 of the Act ... ..	48	47	1
<i>Offences against the Road Traffic Act, 1934.</i>			
Driving a heavy goods vehicle when not licensed for the purpose ... ..	47	47	—
Employing an unlicensed person to drive a heavy goods vehicle ... ..	33	33	—
	1,304	1,289	15

In addition to the offences shown in the foregoing statement, chief officers of police have dealt with many cases arising from the use of vehicles which did not comply with the Motor Vehicles (Construction and Use) Regulations.

At all times the various police authorities have rendered me every assistance to enforce the provisions of the Acts and of the Regulations, and it is desired to express gratitude to the chief constables for the ready response which has been forthcoming whenever their aid has been sought.

*Section 19 of the Road Traffic Act, 1930, as amended by Section 31 of the Road and Rail Traffic Act, 1933.*

16. From the complaints and reports received regarding drivers' hours of duty, there appears to be no doubt that some operators are failing to observe the relevant statutory condition attached to licences granted to them. As shown in paragraph 15, it has been necessary to institute proceedings in a number of cases. There have been many instances where the inquiries made with regard to an alleged offence against Section 16 of the Road and Rail Traffic Act appear to reveal that an offence against Section 19 of the Road Traffic Act, 1930, may also have been committed. Many operators apparently fail to realise the importance of the former section in its relation to the latter section. The enforcement of the provisions of Section 19 is a matter which is receiving close attention, and it is desired again to remind those operators who may fail to comply with the relevant condition of the risk they run of having their licences suspended or revoked.

*Wages and conditions of employment of drivers and statutory attendants on goods vehicles.*

17. During the year, a number of individual inquiries and complaints was referred to the Joint Conciliation Board for the Road Motor Transport Industry (Goods) Yorkshire, and four representations made by organisations representative of persons engaged in the road transport industry were referred to the Chief Conciliation Officer (North-Eastern Area) of the Ministry of Labour. There were no developments arising from these cases which necessitated further action being taken.

There has been considerable activity on the part of the Yorkshire Traffic Area Joint Conciliation Board in an endeavour to reach agreement on the question of wages and conditions of employment within the terms of the report of the National Joint Conciliation Board, but so far an agreement satisfactory to all the hauliers concerned and to the employees' representatives has not been reached.

Until the wages and conditions of service of persons employed in connection with the carriage of goods by road can be agreed upon and until such agreements are observed, either voluntarily or otherwise, an effective settlement of the inter-related problem of the stabilisation of rates is hardly likely to be achieved. In view of the appointment of the committee on the regulation of wages and the conditions of service in the Road Transport Industry (Goods) under the Chairmanship of Sir James Baillie, O.B.E., J.P., LL.D., D. Phil., Vice-Chancellor of Leeds University, it is not proposed to make any further comments on the subject in this report.

*General Remarks.*

18. The only voluntary movement within the inland transport industry towards co-ordination of the services offered by its two largest members, the road haulage operators and the railway companies, is that revealed in the few instances where railway companies have secured financial interest in certain haulage concerns. Where such concerns have applied for additional vehicles, there has been no objection from railway companies, but the companies have continued to offer strenuous opposition to the grant of applications from other road operators for additional tonnage, and similarly, the latter have opposed the applications of railway companies. There is still but little sign of the number of such objections diminishing.

There is one further matter to which it seems to be desirable to refer. It may be regarded as surprising that, after over two years' experience of the working of the Road and Rail Traffic Act, there has not yet emerged a scheme whereby small operators have endeavoured to amalgamate their capital and resources by a process of forming themselves into limited liability companies and thereby securing a status which is hardly attainable by remaining as separate entities. Such combinations amongst individual road hauliers should surely be one of the first movements towards any scheme of co-ordination and self help, provided that the limited companies are started and maintained on a sound basis. It is no exaggeration to say that certain individual hauliers are quite incapable of operating under the conditions now required of them under the Road and Rail Traffic Act, 1933. Many of them have not had the training necessary to ensure that their haulage work is being performed on an economical and law-abiding basis, and for such hauliers, it can be but a matter of time before they find themselves in difficulties.

*Conclusion.*

19. The ready co-operation of the majority of operators, the assistance of the various associations and the publicity given by the Press have all contributed during the year towards the smooth operation of the Act, and I desire to record my appreciation of the apparent desire thus revealed to assist me in my duties. The work in this office, however, has continued to be heavy, and I wish to acknowledge the energetic and efficient services of the clerk, certifying officers and other members of the staff provided to assist in the administration of the Acts in this area.

I have the honour to be, Sir,

Your obedient Servant,

JOSH. FARNDALE,  
Licensing Authority.

## NORTH-WESTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

1. As Licensing Authority for the North-Western Traffic Area under the Road and Rail Traffic Act, 1933, I have the honour to present my Second Annual Report which relates to the year ended 30th September, 1936.

### *Licensing of Goods Vehicles*

2. The following statement relates to the licensing position during the period:—

TABLE I.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>"A" Licences :—</b>					
Currency Period ... ..	215	1,160	57	369	89
Short Term Section 3 (3) ...	2	28	3	19	6
Contract ... ..	—	311	20	291	—
<b>"B" Licences :—</b>					
Currency Period ... ..	968	4,444	50	4,952	216
Short Term Section 3 (3) ...	2	60	7	45	8
<b>"C" Licences :—</b>					
Currency Period ... ..	—	3,731	20	3,461	—
Short Term Section 3 (3) ...	—	230	—	230	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ...	"A": 2	"B": —	"C": 14
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	"A": 124	"B": 52	
Short Term Administrative Licences issued (Section 3 (4)) ...	"A": 144	"B": 94	
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... ..	"A": 72	"B": 11	

TABLE II.—*Applications for variation of Carriers' Licences*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>Variations relating to Vehicles</b>					
<b>"A" Licences :—</b>					
Published and dealt with at Inquiry ... ..	82	3,589	26	392	110
Published but determined without Inquiry ... ..			85	209	—
Not published ... ..			10	2,522	—
<b>"B" Licences :—</b>					
Published and dealt with at Inquiry ... ..	41	1,408	9	170	58
Published but determined without Inquiry ... ..			37	151	—
Not published ... ..			8	916	—
<b>Variations of Conditions attached to "B" Licences...</b>	10	285	34	187	34

3. There were 183 Public Inquiries held, the centres being at Bangor, Barmouth, Blackburn, Blackpool, Caernarvon, Chester, Liverpool, Manchester, Morecambe, Newtown, Preston, Warrington, Welshpool and Wrexham. One Private Inquiry was held at Manchester.

4.

*Objections.*

Application.	Percentage of Objections Lodged.	Percentage of Objections Pursued.
"A" Licences :—		
New applications ... ..	90	88
" Renewals " ... ..	21	15
Variations ... ..	68	63
" B " Licences :—		
New applications ... ..	77	70
" Renewals " ... ..	41	36
Variations ... ..	67	60

*" C " Licensed Vehicles.*

5. The number of applications under Section 2 (4) of the Act during the period was 12. The permission to use a vehicle under a " C " licence to carry goods of a person to whom it was hired was given in every case in respect of the carriage of Christmas Mails only.

*Appeals.*

6. The number of appeals lodged during the period was 19, of which 11 were by applicants for licences or variations and 8 by objectors. Of the total number, 9 were allowed by the Appeal Tribunal, 2 were dismissed, 5 were withdrawn and 3 were outstanding on 30th September, 1936.

*" A " and " B " Licences.*

7. At the commencement of the period under review (Oct., 1935), practically all applications for " A " and " B " licences to operate services in existence prior to the inception of the licensing system had been dealt with by the issue of licences for a first currency period or refusal or withdrawal of the applications. The currency period of " A " licences being for two years, the number of applications for continuation of existing licences falling to be considered in the year ended 30th September, 1936, was small. The actual number of new " A " licences granted during the year was 152, this figure including licences issued in respect of applications lodged but not dealt with during the period covered by my previous report. The full quota of " B " currency licences for the second year was duly dealt with. The number of new " B " licences issued during the year was 543.

8. My duties in respect of the granting of " A " and " B " licences consisted very largely, therefore, of the consideration of applications for " B " licences in continuation of existing licences and for the variation of existing " A " and " B " licences.

9. As in the previous period, practically all the applications considered at Public Inquiries were those in respect of which objections had been lodged. Applications to which objections were not lodged were in the main dealt with in Chambers after the applicants had satisfied me by documentary evidence or by interview that the licences or variations of licences applied for should be granted.

*Objectors.*

10. The railway companies and the road transport companies in which the railway companies have an interest, have continued to be the principal objectors, especially in the more densely populated and industrialised parts of the Area. There has been an increasing tendency on the part of haulage concerns specialising in particular forms of haulage to object in respect of applications affecting their particular businesses (e.g., the carriage of heavy indivisible loads, meat,

milk, liquid fuel, etc.). Local objectors have still been active in the rural parts of the Area including Cheshire and North Wales where there is a more intimate local knowledge of the activities and businesses of the competing hauliers.

#### *Objections.*

11. For the reasons advanced in my last Report, it is the practice of operators of goods transport by road to seek to effect any variations in their fleet at fairly short notice, because the nature of their businesses is such that they consider it inadvisable to wait until applying for a further licence to obtain the authorisation of additional vehicles. The result has been that the "B" applications for licences in substitution for existing "B" licences about to expire have not in the main asked for additional vehicles, or for the extension of the limiting conditions normally attached thereto. Nevertheless, it was found that objections were lodged in respect of over forty per cent. of these applications with the consequent necessity for their consideration at Public Inquiries.

12. The objections by the railway companies were rarely against the continued authorisation of the vehicles applied for, but related mainly to the conditions of the licence for the carriage of goods for hire or reward sought by the applicants in continuation of facilities permitted by their previous licences. The two major points upon which the railway companies sought to obtain a further limitation of the facilities enjoyed by the holders of "B" licences concerned the carriage of coal and furniture. In regard to coal, it was contended as a broad principle that in this Area it was not in the public interest that it should be carried for hire or reward by road for distances extending beyond a seven miles radius of rail-head depots. The reason for this was because the railway companies have undertaken special arrangements for the carriage of coal from the Lancashire Pits. I found that practically every applicant for a "B" licence was quite ready to agree to a special limitation of the conditions of his licence in this respect. As regards furniture, the position was more difficult because a very large number of operators under "B" licences are coal merchants whose carriage of furniture is performed at the request of their customers, the loads consisting of small occasional articles of furniture which would by no means constitute a household removal job. It was argued by the applicants that too severe a limitation in regard to radius would unduly interfere with a feature of their business that had existed over a number of years. Generally, therefore, I found it unnecessary in the public interest to impose limitations stricter than those imposed in the previous licences.

#### *Variations.*

13. As might be expected, applications for the variation of "A" or "B" licences, notably the former, by the authorisation therein of additional vehicles have been made the subject of consistent and strenuous objection. One result of this has been that the number of cases with which it was formerly possible to deal at one Inquiry has fallen considerably.

#### *Evidence.*

14. During the second licensing period the applicants and objectors have more fully appreciated the importance of furnishing particulars in detail in furtherance of the interests they represent. It appears to be realized that a mere statement or the production of a letter, is not always sufficient to give the fullest support to an application or objection and I anticipate that in course of time the parties concerned in an application will be persuaded that their best interests can be served by the personal appearance of those who are likely to be affected by my decision.

#### *Amalgamations.*

15. It cannot be said that during the year there has been any pronounced tendency to combine haulage businesses into large units. It is true that certain amalgamations have taken place but mainly as between businesses already financially controlled by one group of interests or financially associated one with

another. A marked proportion of the applications to which the provisions of Section 11 (3) (b) have been applied were those made necessary by the formation of limited liability companies to succeed to individual businesses or partnership firms.

### "C" Licences.

16. Apart from the consequential increase in "C" licences and vehicles due to the issue of identity certificates as outlined in paragraph 17, I find from my office records a marked actual increase in new "C" licensees and vehicles.

The statistics reveal the following:—From 1 October, 1935, to 31 July, 1936, there was a net increase in "C" licences of 3,229 and of "C" vehicles of 4,423 after allowing for surrendered and cancelled licences during that period. (August and September, 1936, are excluded for the reasons explained in paragraph 17. It would appear, therefore, that although the Railway Companies had from time to time informed me that they were not receiving a fair proportion or share in the improved industrial prosperity, neither was it apparent that the increased traffic had necessarily gone to the "A" and "B" class hauliers, but the contributory factor may be found in this increase of "C" vehicles which to some extent shows that the traders were meeting their requirements by acquiring their own vehicles or by adding to their existing fleets. A typical example within my knowledge is the milk traffic where a trader took out a "C" licence for forty vehicles to carry milk which formerly was conveyed by "A" and "B" hauliers. Indeed, this has not been confined solely to the year under review but has developed over the past year or so and in respect of this I would quote the following examples of the considerable numerical increase in the "C" vehicles by four typical firms:—

	1934	1936	=	2 years.
(1)	816	981	=	+ 165
(2)	114	152	=	+ 38
(3)	212	311	=	+ 99
(4)	12	50	=	+ 38
				<hr/>
	4 licensees have		=	
	an increase of		=	<u>340</u>

### Identity Certificates.

17. Under Article 12 Goods Vehicles (Licences and Prohibitions) Regulations, 1936, issued 26 March, 1936, it became necessary as from 1 October, 1936, for all vehicles authorised under "C" licences to display identity certificates. The preparation and issue of some 46,000 of these presented a task of some magnitude but the issue was completed by the beginning of September, 1936. The wisdom of this additional measure of control became immediately apparent as my Office was inundated forthwith by enquiries and applications for variation of licences by operators of goods vehicles who had been using their vehicles without the proper authorisation of a licence. During September 1936, and immediately following thereon, some thousands of licence adjustments were dealt with by my staff.

### Wages and Conditions of Employment.

18. Under Section 93, Road Traffic Act, 1930, as amended by Section 32, Road & Rail Traffic Act, 1933, there were 37 representations made to me by organisations representative of persons engaged in the road transport industry, alleging that certain operators were not complying with the law relating to the wages and conditions of employment of drivers or statutory attendants of vehicles authorised under "A" or "B" licences. These representations were referred to the Chief Conciliation Officer for the North Western Area and by 30 September, 1936, 15 complaints had been satisfactorily settled by him.

19. From my experience during the year, I am not satisfied that the provisions of Section 93 of the Road Traffic Act, 1930, as amended by Section 32 of the Road and Rail Traffic Act, 1933, are proving effective for ensuring the

standardisation of wages and conditions of employment of drivers employed in the road transport industry. I do not propose, however, to comment at length upon this because the Licensing Authorities' views have already been placed before the Committee on Regulation of Wages, &c., in the Road Transport Industry (Goods).

*Maintenance of Goods Vehicles.*

20. Certifying Officers and Vehicle Examiners have consistently examined goods vehicles to effect further improvement in the standard of maintenance and condition. During the year 13,692 vehicle examinations were carried out arising out of which a total of 1,778 prohibition notices were issued under Section 17, Road and Rail Traffic Act, 1933, including 510 "immediate" prohibitions.

21. It is found that the maintenance and roadworthiness of vehicles in this Area has considerably improved as reflected in the reduced percentage of prohibition notices per number of vehicles examined. A factor in this improvement undoubtedly is the close inspection work carried out during the period covered by my First Annual Report, operators becoming alive to the fact that their vehicles were liable to inspection at any moment without prior notice.

22. Reviewing the causes leading to the issue of prohibition notices it is found that defects which have been mainly responsible for the issue of these notices concern steering, road springs and shackles, and brakes.

23. No operator exercised the right of appeal to the Certifying Officer or the Minister allowed under Section 17 of the Road and Rail Traffic Act, 1933, in consequence of the refusal of an Examiner or Certifying Officer to remove a prohibition order.

*Accidents to Goods Vehicles.*

24. It is the practice to investigate accidents coming under the notice of the Certifying Officers and Examiners, or reported by the police, or observed in the Press, and in this connection 312 vehicles were examined after they had been involved in accidents. Of this number, 59 were, in the opinion of the police, due to defects in the vehicles concerned. Certifying Officers paid particular attention to these cases and in each case forwarded to you either a formal report or a considered opinion.

*Licences to drive Heavy Goods Vehicles.*

25. The position at 30th September, 1936, in connection with the licensing of drivers of heavy goods vehicles was as follows:—

Applications outstanding at 30th September, 1935	...	6,873
Applications received since 30th September, 1935	...	8,919
		<hr/>
		15,792
		<hr/>
Licences issued	...	13,959
Licences refused	...	117
Applications withdrawn	...	1,309
Applications outstanding at 30th September, 1936	...	407

26. Examiners have conducted 2,301 driving tests as required by Section 31 (5) of the Road Traffic Act, 1934, with the following results:—

Passed first test	...	2,186
Failed first test and subsequently passed	...	17
Failed first and subsequent tests	...	81

The percentage of failures to tests carried out is approximately 4.33.

27. In addition 634 successful driving tests have been conducted by 21 approved Examiners employed by 10 large operators.

28. There has not been an appeal to courts of summary jurisdiction in connection with refusals of applications for licences to drive heavy goods vehicles.



*Enforcement.*

29. The following statement shows the prosecutions undertaken by me as Licensing Authority during the year:—

Act.	Section.	Offence.	Summonses heard.	Convictions recorded.	Dismissed or withdrawn.
Road Traffic Act, 1930.	Sect. 19 as amended.	Excessive hours of driving or insufficient rest period.	1,183	1,150	33
Road and Rail Traffic Act, 1933.	Sect. 1	Using unauthorised vehicle ...	383	380	3
	Sect. 9	Contravening licence conditions	32	31	1
	Sect. 16 and Regs.	Incomplete or incorrect records, etc.	1,511	1,492	19
	Sect. 17	Using prohibited vehicle ...	30	28	2
	Sect. 34	Making false statements for the purpose of obtaining a licence.	3	3	Nil
Goods Vehicles (Licences and Prohibitions) Regulations.	Reg. 12	Identity certificates or markings not applicable to vehicle or failure to display identity certificate.	95	92	3
" "	Reg. 17	Failure to notify change of address.	2	2	Nil
" "	Reg. 20	Failure to surrender licence	1	1	Nil
" "	Reg. 21	Failure to notify and surrender licence.	9	9	Nil
Motor Vehicles (Const. and Use) Regulations, 1931.	Reg. 59	Overloading ... ..	2	1	1
Road Traffic Act, 1934.	Sect. 31	Driving or employing a person to drive a heavy goods vehicle without licence.	81	79	2
Heavy Goods Vehicles (Drivers' Licences) Regulations, 1935.	Reg. 12	Failure to surrender licence on revocation.	1	1	Nil
			3,333	3,269	54

30. The above table excludes prosecutions undertaken by the police authorities without reference to or assistance from my staff. In addition to the prosecutions tabulated above, some 3,750 warnings were issued during the year in respect of minor or isolated offences.

*Drivers' Hours.*

31. I indicated in my last report that it was my intention that Examiners should during the year now under review, pay particular attention to the enforcement of Section 19 of the Road Traffic Act, 1930, in relation to the operation of goods vehicles and it will be observed that activities in this direction have resulted in a very large number of police court proceedings for offences concerned with excessive hours of driving. A feature of the information obtained by the Examiners is that failure to conform to the law in this respect was by no means confined to any particular type of haulier.

It is manifest there existed an impression in the minds of a large proportion of traders operating vehicles under "C" Licences that 11 hours per day should be regarded as the normal working day for the driver of a goods vehicle. These operators did not apprehend the significance of the limitations set out in Section 19 of the Road Traffic Act, 1930, as being the limits of safety and it was frequently advanced in their defence in police court proceedings that the offences alleged were merely technical because the "statutory" hours of driving had been exceeded only by some 20 to 30 minutes.

32. The fact that Examiners are still detecting offences under Section 19 of the Road Traffic Act, 1930, in large numbers, leads me to the belief that

although there has been some small improvement in this direction there is still a widespread disregard for the law.

33. I desire again to put on record the help and co-operation of the police authorities in my Area who have shown themselves at all times ready and anxious to assist me in the enforcement of the Acts, often at some inconvenience to their own organisation.

34. As in the previous period there has been no lack of co-operation by the goods transport industry generally and this co-operation has been exemplified by the excellent work carried out by the various organisations of road operators.

35. I must also extend my thanks to the Clerk, the Certifying Officers and the Staff who have performed their duties in a highly commendable manner often under difficult and pressing circumstances.

I have the honour to be, Sir,

Your obedient Servant,

W. CHAMBERLAIN,

Licensing Authority.

## WEST MIDLAND TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to present to you in accordance with Section 23 (4) of the Road and Rail Traffic Act, 1933, my Second Report in regard to the duties under Part I of the Act placed by Section 4 upon me as Licensing Authority for the West Midland Traffic Area. This report covers the period from the 1st October, 1935, to the 30th September, 1936.

As in my First Report, I desire to express my appreciation of the ready help given me by my deputy, Dr. W. Dawson Sadler, M.A., LL.D., Barrister-at-Law, and by the two Certifying Officers. I also take this opportunity of bringing to your notice the good work of the staff you provided me for administration in my Area under the able guidance of Mr. S. W. Nelson as Clerk until the beginning of July last, when he left to take a new appointment as Chairman of the Transport Licensing Board in the Federated Malay States.

Representatives of the various commercial transport interests both road and rail alike concerned in the licensing procedure, as well as the Police Authorities throughout my Area, have, I feel, in their various spheres all done their best to assist towards any measure of success already achieved under the Act.

### *Observance of Conditions attached to Licences.*

2. The current position in relation to the observance of conditions attached to licences authorising the use of goods vehicles under the Act is an indication of progress in the administration of the Act itself and is, therefore, dealt with in the opening paragraphs of this report.

Though the Act was designed to regulate the carriage of goods on roads by motor vehicles and thus limit evils arising from wrongful competition between various forms of transport, as well as primarily between the road carriers themselves, the enforcement of the provisions of this Act and of allied legislation has to be weighed also from the vital point of view of safety. In view of the importance of these aspects, I have set out in detail particulars of actions I have taken not only with regard to operating without the appropriate licences but also on account of offences against conditions attached to licences in respect of mechanical fitness of vehicles, overloading, speeding, excessive hours of driving and the keeping of the statutory records designed to be a check thereon, all of which may have a direct bearing on the safety of the highways as well as having to be considered in regard to the conveyance of "false" traffic and unfair competition.

The police authorities have taken action in a very large number of instances with respect to limits of speed and weight. Legal proceedings in the West Midland Traffic Area were instituted in 1,216 cases involving other breaches of the licence conditions; in 753 of these proceedings were instituted by me, as Licensing Authority.

Convictions were obtained in 1,180 cases, 15 were withdrawn and 18 dismissed, leaving three cases outstanding at the end of the year under review.

Details are given in the following table:—

TABLE I.—*Prosecutions 1935-1936.*

Offence under Road and Rail Traffic Act, 1933.	No. of summonses.	Con- victions.	Cases with- drawn.	Cases dismissed.	Cases with action pending.
Sec. 1. (Using a goods vehicle otherwise than under a Carrier's Licence) ...	126	125	—	1	—
Sec. 8. (Failing to maintain authorised vehicle in fit and serviceable condition) ... ..	1	1	—	—	—

Offence under Road and Rail Traffic Act, 1933.	No. of summonses.	Con- victions.	Cases with- drawn.	Cases dismissed.	Cases with action pending.
Sec. 9. (Failing to comply with conditions of licence in respect of —)					
(i) Maintenance of authorised vehicle	1	1	—	—	—
(ii) Hours of drivers ... ..	4	4	—	—	—
(iii) " C " licensed vehicle used for hire or reward ... ..	10	8	—	2	—
(iv) Keeping of records ... ..	119	113	4	2	—
(v) Radius in which " B " licensed vehicles may be used ... ..	3	3	—	—	—
Sec. 16. (Failing to keep records, or failing to cause records to be kept) ...	57	57	—	—	—
Sec. 17. (Using a vehicle whilst under Prohibition) ... ..	7	5	—	2	—
Sec. 18. (Failing to produce records) ...	17	15	1	1	—
Sec. 19 of 1930 Act as amended by Sec. 31 of 1933 Act :—					
(i) (Causing or permitting excess of maximum hours : or Causing or permitting less than the specified rest periods) ... ..	161	154	5	2	—
(ii) (Driving in excess of maximum hours : or having less than the specified rest periods.) ... ..	71	71	—	—	—
Sec. 34. (Using index mark on a vehicle to which it did not refer) ... ..	1	1	—	—	—
Sec. 34. (Knowingly make false statement for the purpose of obtaining a licence) ... ..	1	1	—	—	—
<i>Offences under other Acts :</i>					
Sec. 5. <i>Perjury Act, 1911.</i> (Making a false statement in a record). (Two defendants) ...	8	2	—	6	—
<i>Sec. 31. Road Traffic Act, 1934.</i>					
(i) (Employing unlicensed Heavy Goods Vehicle Driver) ... ..	29	29	—	—	—
(ii) (Driving Heavy Goods Vehicle, not being so licensed) ... ..	13	13	—	—	—
<i>Offences under Regulations :</i>					
<i>The Goods Vehicles (Keeping of Records) Regulations, 1935</i> ... ..	347	337	5	2	3
<i>The Goods Vehicles (Licences and Prohibitions) Regulations</i> ... ..	31	31	—	—	—
<i>The Motor Vehicles (Construction and Use) Regulations, 1931</i> ... ..	209	209	—	—	—
Total ... ..	1,216	1,180	15	18	3

Even in the face of the above figures I am able to report that the position in regard to the observance of the provisions of the Road Traffic Acts has steadily improved during the past year, though it is still far from satisfactory. As will be seen from the number of cases in which legal proceedings were taken, some of the measures foreshadowed in my previous report have had to be employed, and although I have not yet taken the extreme steps of suspension or revocation of licences I fear I may yet have to resort to drastic action by way of example before a reasonable standard of observance is attained.

In the main, the general policy described in my last report has been continued. Legal proceedings have been instituted in only a small proportion of reported cases which have been selected for special reasons. My Traffic

Examiners, the number of whom has been doubled recently, have been instructed to show special consideration to those who evince a desire to conform with the requirements of the law. In pursuance of this policy, the method of issuing cautionary letters and of warning and instructing offenders by personal interview has been continued in most of the cases where there is a prospect of the desired result being thus obtained. I have been encouraged to pursue this selective course still further by the considerable number of reports subsequently received from my officers which show that, speaking generally, offenders have profited by the advice given them.

Subsequent to warnings, special steps, such as the award of a bonus for freedom from offences, have been taken by some operators in an effort to obviate a recurrence of offences, and governors or mechanical recorders have been fitted to vehicles to check speeding. In order to avoid excess weight upon the back axles many operators have either had additional axles fitted to their vehicles or have changed them for a type enabling the load to be more evenly distributed. The special action taken with regard to maintenance is noted in a later paragraph of this report.

The reports of my Examiners throughout the year reflect improvement also in the keeping of records by the drivers of vehicles of all classes operated under licences. There, however, appears to be a good deal of indifference amongst the drivers of tradesmen's vans operated locally under Private Carriers' Licences to the keeping of a record at all.

I am disturbed at the continued gross disregard to the requirements of Section 19 of the Road Traffic Act in respect of hours of driving and am still more concerned to find that certain drivers engaged on long distance haulage for hire or reward and their employers have discovered that it is possible for a time to deceive the Licensing and Police Authorities by making false records. Falsification of records merits the severest penalty especially when it is with the connivance of or at the instigation of or under threats from the licence holder. It is as well known to the users of goods vehicles as it is to those entrusted with the duty of enforcing the law that offences of this nature are difficult to detect. The improvement in the technique of the law-breaker, however, is being countered by the greater improvement in the methods of detection, so that it may be hoped the fruits of this type of law breaking may in course of time become too costly.

A most marked feature of the work of enforcement during the year has been the still closer liaison of my staff with the Police Authorities and its results. I am deeply impressed with the possibilities of such co-operation which is being so readily accorded as soon as personal contact is established, and I desire again to take this opportunity of expressing my appreciation of the assistance so readily and effectively rendered to me by Chiefs of Police and their Officers in those districts where the limited resources at my disposal have enabled joint action to be undertaken.

#### *Heavy Goods Vehicle Drivers' Licences.*

3. The licensing of drivers of heavy goods vehicles proceeded smoothly, but experience showed that amending legislation was necessary to facilitate the licensing of new entrants. The issue of provisional licences authorised by the Road Traffic (Driving Licences) Act, 1936, to meet the difficulty, did not apply before the end of the year under review; consequently the working of the new system is not included in this report.

The number of applications under Section 31 of the Road Traffic Act, 1934, for "vocational" licences to drive heavy goods vehicles received during the year under review amounted to 4,666. These applications, together with the 739 applications which were under consideration on the 30th September, 1935, were dealt with as follows:—

Granted	...	...	...	...	...	...	...	5,006
Refused	...	...	...	...	...	...	...	128
Withdrawn	...	...	...	...	...	...	...	160
Consideration not completed by 30th September, 1936								111

The number of driving tests carried out by my Examiners was 862. The number of applicants passed at the first test was 804, a further 18 passed at

a subsequent test. A licence was refused in 20 cases owing to failure to pass the test, and the remaining two are awaiting a further test.

The number of applicants tested and passed by other persons I have authorised to carry out tests was 423, of which 357 passed at the first test and 33 at a subsequent test.

There have been no appeals to Courts of Summary Jurisdiction by any person aggrieved by the refusal or failure to grant a heavy goods vehicle driver's licence.

#### *Vehicles.*

4. About a third of the total vehicles in my Area have been examined during the year. In view of the high percentage found to be badly maintained I have made it known by warning letters to the operators and by announcements at public inquiries that offenders must not expect to receive further warnings before some drastic action is taken. In order to obtain a reasonable standard I am now contemplating a more stringent line with regard to the contravention of the condition attached to the licences that vehicles shall be maintained in a fit and serviceable condition.

During the period embraced in this report the Certifying Officers and Vehicle Examiners in the West Midland Traffic Area have inspected 16,642 goods vehicles; prohibition notices were served upon the owners in respect of 1,993 vehicles, or 11.9 per cent. of the vehicles examined. Of the 1,993 notices served, 299 or 15 per cent. were immediate prohibitions as the vehicles were in a dangerous condition, whilst in the remaining 1,694 cases the prohibition was delayed for varying periods within the maximum of 10 days permitted for the remedying of defects. In about 15 per cent. of the delayed prohibitions the vehicles were in a particularly bad though not necessarily dangerous condition.

As in previous years, defects in steering gear, front axle assembly, brakes and weaknesses in the structural members were not uncommon. Examination by my staff has frequently led to an accelerated replacement of an old vehicle by a more modern machine. In the heavy goods vehicle class there has been an increase during the year in heavy oil engines. The emission of noxious fumes from these machines is generally due to inefficient maintenance. For local distribution work light electric vehicles are being increasingly used.

No applications have been made to me to have a vehicle inspected by a Certifying Officer on the grounds that the owner is aggrieved by the refusal of an Examiner to remove a prohibition, and consequently no appeals have been made to you as Minister of Transport under Sub-section (8) of Section 17 of the Act.

It is a matter of considerable satisfaction to me that the work of the Certifying Officers and the Vehicle Examiners has proceeded smoothly without encountering antagonism. Operators may very readily be aggrieved at the prohibition of vehicles, but instead of being so aggrieved at the action taken, they have, in many instances, welcomed and even sought the advice and assistance of my technical officers. There is a very healthy respect for their technical efficiency and tact in the difficult duties they are charged to perform, and with the growing co-operation between my technical staff and the operators I look forward to a still greater improvement in the standard of maintenance of vehicles in the West Midland Area.

It is generally recognised that vehicles are now being produced which normally have more effective braking systems than their predecessors. Where brake defects are found they can usually be attributed to inadequate maintenance due sometimes to ignorance, but more commonly to general slackness and a desire on the part of the owner to effect every possible saving in expenditure on vehicle maintenance. Whilst the driver may have knowledge of deteriorating brakes he often tries to adapt himself to them as they become less efficient, being reluctant to importune his employer. There is, accordingly, often delay in reporting the deterioration with consequent courting of unjustifiable risk.

Every opportunity is taken of emphasising that proper maintenance is of the utmost importance and that it is the duty of operators of their own initiative to keep a constant check on the efficiency of their vehicles as their contribution towards the national task of securing greater safety.

5. Trailers still continue to require much attention, particularly in relation to their coupling and braking. A certain type of two-wheeled trailer drawn behind private cars has been gaining popularity during the year; many of these trailers have been made by the owners themselves who have no knowledge of the construction necessary to ensure safety on the road. Instances have been brought to my notice where the owners have bought secondhand axles from break-up yards and constructed bodies upon them. The method of attachment to the private car has usually been most unsatisfactory and the draw-bar totally inadequate for towing purposes. One such home-made trailer was observed to be carrying 17 cwt. of paint and builders' materials, and it was apparent even without technical knowledge that the towing of such a vehicle without efficient braking mechanism was a danger on the road.

Unfortunately, private cars towing trailers do not come within the scope of the licensing provisions of the Act unless goods are being carried for hire or reward in the trailer. The majority of the trailers in question are owned by ancillary users and many are to be found in the more important fruit and vegetable and livestock markets. Although the Act does not at present give me any powers of regulation or control of such vehicles, my technical staff are doing their best to bring to notice the more unsatisfactory defects with a view to persuading the owners to have the defects remedied.

The vehicles authorised under Public Carriers' "A" Licences may be regarded as the best maintained class of vehicles, whilst the vehicles authorised under Private "C" Carriers' Licences are still the worst, as I stated in my first report. Traders and manufacturers naturally direct their attention to the business side of their activities, so that when transport is merely ancillary to the business the maintenance of vehicles often becomes a secondary consideration.

In a number of cases it has been found necessary to press owners, particularly private carriers, to institute better maintenance systems. Where improvements in maintenance cannot readily be undertaken on the premises the services of local garage proprietors are now to a great extent being secured under contracts to maintain the vehicles in consistently good repair, but I have had occasion to point out that the employment of an agent does not enable the licensee to evade his own responsibility.

#### *Applications for Licences.*

6. The initial period of licensing to 30th September, 1935, was dealt with in my First Annual Report.

Since two years is the currency period for Public Carriers' "A" Licences which first came into force on 1st October, 1934, none of this class expired until 30th September, 1936; this Report consequently deals with the consideration of only about 200 applications, constituting the first instalment of new licences for the second currency period of licences of this class to continue existing public carriers' activities. This Report covers, however, the completion of my second annual review of the whole of the current Limited Carriers' "B" Licences and the issue of licences to new applicants during the second year, together with that portion of my third review prior to 30th September, 1936, of the first quota of "B" Licences expiring at the beginning of the third year.

Although, as will be seen from Table II, a large proportion of variations to both Public and Limited Carriers' Licences were considered during the year, the plan adopted at the commencement of spreading the work so that about 600 Public or Limited Carriers' Licences expired each month, except August, enabled me without causing delay in the issue of the licences, to give full consideration to all applications, by existing operators as well as by individuals who applied for licences for the first time. Except in a few cases, where for some special reason I delayed my determination of an application, fresh licences were issued before the existing licences expired, so that there was, as a rule, no hiatus in the possession of current identity certificates for the authorised vehicles.

No Private Carriers' "C" Licences issued for the first currency period expire before 30th June, 1937, as this type of licence is valid for three years, but during the year under review numerous applications for new "C" Licences as well as for variations to current licences were dealt with promptly.

The disposal of the applications for licences and for variations thereto received during the year ended 30th September, 1936, is shown in the following table:—

TABLE II.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding on Oct. 1st, 1935.	Applications received during the year.	Applications disposed of during the year.			Applications outstanding on Oct. 1st, 1936.
			With-drawn.	Granted.	Refused.	
"A" Licences:—		** 606				
Currency Period ...	42	606	51	336	66	195
Short Term, Section 3 (3)	1	5	—	5	—	1
Contract ...	—	241	—	241	—	—
"B" Licences:—		4,078				
Currency Period ...	886	4,078	130	4,389	131	314
Short Term, Section 3 (3)	3	17	—	17	—	3
"C" Licences:—		2,976				
Currency Period ...	16	2,976	—	2,946	—	46
Short Term, Section 3 (3)	—	133	—	133	—	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with:—

Published ... .. "A": — "B": — "C": —  
 Not published ... .. "A": 1 "B": — "C": 2

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were considered:—

Without publication ... .. "A": 26 "B": 17  
 After publication ... .. "A": 133 "B": 87

Short Term Administrative Licences issued (Section 3 (4)) ... "A": 22 "B": 73

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... .. "A": 18 "B": 14

Nature of Variation.	Applications outstanding on Oct. 1st, 1935.	Applications received during the year.	Applications disposed of during the year.			Applications Outstanding on Oct. 1st, 1936.
			With-drawn.	Granted.	Refused.	
<i>Variations relating to Vehicles.</i>						
"A" Licences:—						
Published and dealt with at Inquiry ...	72	2,209	47	241	85	27
Published but determined without Inquiry			—	92	—	
Not published ...			5	1,784	—	
"B" Licences:—						
Published and dealt with at Inquiry ...	45	1,646	30	184	53	33
Published but determined without Inquiry			—	109	—	
Not published ...			5	1,277	—	
Variations of Conditions attached to "B" Licences ...	—	82	7	46	24	5



TABLE III.—Goods Vehicle Licensing.

Number of Licences of each class, number of vehicles authorised thereunder, and average number of vehicles per licence in the West Midland Traffic Area at 30th April, 1936.

	" A " Licences (including Short Term).			" A " Contract. Total.	" B " licence (Including Short Term). Total.	" C " licence (Including Short Term). Total.	All Licences.		
	Rly. Cos.	Others.	Total.				Rly. Cos.	Others.	Total.
No. of Licences ... ..	7	2,655	2,662	270	3,590	13,969	7	20,484	20,491
No. of Vehicles authorised :—									
(i) Motor Vehicles in possession ... ..	956	6,921	7,877	391	5,326	26,930	956	39,568	40,524
(ii) Motor Vehicles to be hired ... ..	29	29	58	7	22	82	29	140	169
(iii) Trailers in possession or to be hired ... ..	365	391	756	24	71	536	365	1,022	1,387
(iv) Trade Plates ... ..	—	—	—	—	—	242	—	242	242
Total number of Vehicles	1,350	7,341	8,691	422	5,419	27,790	1,350	40,972	42,322
Average number of Motor Vehicles in possession per licence 30th April, 1936 ... ..	—	—	2.97	1.45	1.48	1.93	—	—	1.98
<i>Figures as at 30th September, 1935 for comparison.</i>	<i>Total Vehicles</i>		<i>8,364</i>	<i>266</i>	<i>5,479</i>	<i>26,244</i>	<i>1,156</i>	<i>39,197</i>	<i>40,353</i>
	<i>Vehicles per licence ...</i>		<i>3.10</i>	<i>1.56</i>	<i>1.46</i>	<i>2.04</i>	—	—	<i>2.07</i>

#### Objections or Representations under Section II (2).

7. As in the first year, comparatively few representations against the grant of applications were received from road operators, but many applications to continue without modification as well as most applications by "newcomers," or by established operators for an increase in vehicles or tonnage, produced objections from the London, Midland and Scottish Railway Company and the Great Western Railway Company, which are the Railway Companies primarily concerned with transport facilities in the West Midland Area. The number of objections lodged by these Railway Companies and by road operators respectively is shown in the following table:—

TABLE IV.

Classes of Application.	No. of Applications published.	Opposed by Railway Companies.		Opposed by Road Operators.	
		No.	Percentage	No.	Percentage
<b>" A " Licences.</b>					
First application ... ..	238	175	73.5	30	12.6
Continuation with modification ... ..	26	17	65.3	Nil	Nil
Continuation without modification ... ..	302	37	12.2	1	0.3
Variation ... ..	441	316	71.6	46	10.4
<b>" B " Licences.</b>					
First application ... ..	590	350	59.3	66	11.1
Continuation with modification ... ..	557	377	67.6	53	9.5
Continuation without modification ... ..	2,786	673	24.1	3	0.1
Variation ... ..	390	294	75.3	28	7.1

In all cases, except where the objections were subsequently withdrawn, the representations were heard at public inquiries.

The particular information, conveyed in the new statutory form of objection brought into use on the 1st May, 1936, though it does not always indicate the reason for the objection, has frequently helped to save time at public inquiries by concentrating the examination on the specific point to which the objection was particularly directed.

A further saving would be gained in many cases if still more explicit indication of the reason for the objection were furnished with the statutory notice of objection. The two railway companies concerned have, however, endeavoured in a number of instances to save inconvenience to applicants by communicating with them upon doubtful or ambiguous points arising in their applications, with a view of withdrawing or modifying their objection when the doubtful position has been clarified. In some cases this procedure is regarded with suspicion by the applicant or his Association in spite of the possible saving of time and expense at public inquiries. On the other hand, objections have been maintained in instances where I have fully explored the position previously, and I have felt constrained to make observations upon waste of public time as well as on the unnecessary inconvenience suffered by the applicant to whom it may mean at least the loss of a day's work.

The objections of the Railway Companies to applications for Limited Carriers' "B" Licences in continuation of existing licences were, in the majority of cases, explored during the first licensing period, and after taking these objections again into consideration during the second year I have not been impressed with the representations that the conditions attaching to "B" Licences should be tightened each year in accordance with a reduction in the zone of operation due to what may be only a temporary increase in the demand for more local haulage in lieu of the longer journeys which may be required again.

The applications received prior to the 30th September, 1936, for this class of licence for the third currency period were mainly for licences without any modification of the existing licences. Of the 921 such applications received, 3.6 per cent. were opposed by the Railway Companies. It appears, therefore, that all parties are now as a rule accepting the current position with respect to limited carriers' licences.

The practice which has been called a "fishing expedition" has not been followed so assiduously in the light of the policy I have adopted in refusing to pare down the special condition to meet every conceivable situation, e.g., the field of activity of operation, the class of commodities carried, or the person or persons for whom the goods are to be carried. As I indicated in my first report, my aim has been to give reasonable local fluidity to vehicles used under Limited Carriers' Licences and it has been my practice throughout the second year to review the special condition in such a manner as to provide only essential protection to other providers of transport and at the same time to frame the conditions so that they may be readily observed and checked if necessary. I have seen no reason to change the view expressed in my first annual report that to the detriment of the Railway Companies the number of Public Carriers' vehicles would tend to increase as the result of meticulous restriction of Limited Carriers' activities.

#### *Acquisition of Businesses, Section II (3) (b).*

8. As will be seen from Table II, in the majority of the cases I have given notice in "Applications and Decisions" of applications for "A" or "B" Licences to expire not later than an existing licence under which the vehicles to which the application relates are authorised to be used for the purposes of a business which the applicant has acquired or intends to acquire. In general, such applications have been considered by me at a public inquiry; where, however, I find a clear case I do not normally allow a locus to those who may have lodged representations.

It has always been my practice to regard as confidential any information furnished with regard to the financial details of the purchase and sale of businesses, and the purchaser and vendor at a public inquiry have always been afforded the opportunity of writing down the details for my information in order that they should not be publicly disclosed. Careful examination, however, has

been fully warranted by reason of the number of vehicles which have been found to have been out of use for lengthy periods of time. There is no doubt that attempts continue to be made both by existing operators and by intending new entrants to the haulage industry to obtain vehicles by purchasing a derelict business, and that the value of licences issued under the Act is becoming more and more appreciated.

Of the 263 applications to which Section 11 (3) (b) applied the majority related to the transfer of a haulage business from a small operator to another small operator. Though there has been some amalgamation of substantial interests, there has been little evidence during the year of any general trend of absorption.

On 30th April, 1936, in my Area with a total of 6,314 holders of Public and Limited Carriers' Licences, including Contract Licence Holders, 5,856 held licences where the number of authorised vehicles did not exceed four, and of this number 4,167 held licences which authorised only one vehicle per licensee.

A large proportion of the smaller operators have not yet joined any organisation or association; accordingly the question of uniformity in the rates charged is a difficult one for the industry, especially as there is a large number of owner drivers living hand to mouth, disregarding of the economics of operation even if not in total ignorance of the necessity of adopting a proper basis for assessing the charges necessary to maintain sound operation.

#### *Public Carriers' Licences.*

9. The following table shows the number of vehicles authorised under Public "A" Carriers' Licences (excluding Contract "A" Licences) on 30th September, 1935, the 30th April, 1936, and 30th September, 1936, respectively:—

<i>Date.</i>	<i>Railway Companies.</i>	<i>Others.</i>	<i>Total.</i>
30th September, 1935 ...	1,156	7,208	8,364
30th April, 1936 ...	1,350	7,341	8,691
30th September, 1936 ...	1,431	7,474	8,905

These figures reflect an increase during the year of 24 per cent. in "A" class vehicles authorised for use by railway companies and 4 per cent. by road operators, including the road companies controlled by the railway companies.

The increase in the number of vehicles authorised for use by the railway companies is attributable to the additional vehicles in respect of which they have justified the need, either on the grounds of additional collection and delivery of rail-borne goods, or for the replacement of horse teams. What small increase there has been in the number of road vehicles by operators other than the railway companies is partly due to operators bringing into use further vehicles which have previously been authorised to be acquired as part of their claimed tonnage. Some additional vehicles have, however, been shown necessary to deal with increased milk production fostered by the Milk Marketing Board schemes, whilst others have been authorised to share the extra transport facilities required by the increasing prosperity of the many trades and industries of Birmingham, Coventry, the towns in the Potteries, and the towns in and around the Black Country, or else for local work mainly in connection with road construction and the building trade.

The addition of road vehicles available for competition with the railways has not been entirely arrested, but the statistics so far available, though somewhat vitiated by the acquisition of vehicles in respect of balances of claimed tonnage, indicate that ordered competition in the volume of tonnage has been reached in substitution for the chaotic conditions prevailing before the inception of the licensing system. The system introduced certainly enables the number of vehicles required to be assessed in reasonable relationship to the fluctuating needs of industry.

It is not practicable from the information available to indicate the proportion of road tonnage operated by public carriers on specific trunk routes where they may be in special competition with the railway companies, but I have had ample evidence before me at public inquiries to satisfy me that in general the competition on trunk services is less than it was in 1933. Further,

it is apparent that the majority of "A" Licence holders are engaged in work where goods do not fall to be carried long distances.

In the West Midland Traffic Area on 30th April, 1936, excluding 225 holders of 270 Contract "A" Licences, there were 2,652 holders of 2,662 Public Carriers' Licences, representing 43 per cent. of the total number of operators authorised to carry goods for hire or reward. Certain of the holders of Contract "A" Licences also hold Public Carriers' "A" Licences. The net figure of "A" Licence holders is 2,730. Of this number four did not own any vehicle, being licensed to use only hired vehicles or only trailers, 1,462 or 53·55 per cent. owned only one vehicle, 527 or 19·30 per cent. owned two vehicles, 232 or 8·50 per cent. owned three vehicles, and 147 or 5·39 per cent. owned four vehicles. Thus the number of public carriers operating four vehicles or less authorised under Public Carriers' Licences is 2,372, whilst the number operating more than four vehicles is 358 or only 13·11 per cent. of the total number of public carriers in the West Midland Area, excluding Railway Companies. The total number of vehicles authorised for use under these licences was 6,921 and the average number of motor vehicles in possession per licence was 2·61.

#### *Contract "A" Licences (Section 7 (1)).*

10. The number of holders of Contract Licences on 30th September, 1936, was 305 authorising 591 vehicles, representing an increase of 169 vehicles since 30th April, 1936, and an increase of 325 vehicles since 30th September, 1935. During the last few months the monthly additions of this class of vehicle have risen from 22 to 66.

Applications have been dealt with normally on the day of receipt, and the facility with which vehicles can be placed on the road under Contract "A" Licences without having to wait for a public inquiry no doubt accounts for the increased rate of growth of this class of licence.

Twenty-nine Contract "A" Licences authorising 43 vehicles were surrendered during the year. Under this class of licence it is still possible for goods to be carried at an uneconomic rate by an operator who may make a bare livelihood for a period of several months before being compelled to surrender the vehicle to the company which financed the transaction under the hire-purchase system. The lowest possible rate is naturally sought by many manufacturers and traders, irrespective of the responsibilities and obligations of the road transport operator, and it is apprehended that the unsatisfactory and inconsistent service inherent in such an arrangement will gradually lead to additional patronage of the services provided by reputable road operators or of rail services. In the meantime the cumulative effect of the abuse made possible by the use of vehicles operated under Contract "A" Licences is considerable; it may accordingly be found necessary to explore the applications at public inquiries as well as to direct special attention to the observance of the conditions attached to the licence.

#### *Limited Carriers' Licences.*

11. The number of vehicles authorised under Limited Carriers' "B" Licences on the 30th September, 1935, was 5,479; on the 30th April, 1936, 5,419 vehicles; and on the 30th September, 1936, a total of 5,538 vehicles, representing a net increase during the year of 59 vehicles or 1·08 per cent.

A large number of vehicles ceased to be authorised under these licences, whilst on the other hand some additional vehicles have been sanctioned for use by new entrants to the haulage industry, particularly by coal merchants, builders' merchants or "odd jobbers" operating within a radius of a few miles from their base.

On the 30th April, 1936, there were 3,584 holders of 3,590 Limited Carriers' Licences, representing 57 per cent. of the total number of operators authorised in my Area to carry goods for hire or reward. Of this number 19, or ·53 per cent., owned no vehicle, being licensed to use only hired vehicles or only trailers; 2,705, or 75·47 per cent., owned only one vehicle; 519, or 14·47 per cent., owned two vehicles; 171, or 4·77 per cent., owned three vehicles; and 70, or 1·95 per cent., owned four vehicles. The number of Limited Carriers operating four

vehicles or less was thus 3,484, whilst the number operating more than four vehicles was 100, or only 2·8 per cent. of the total number of Limited Carriers in the West Midland Area. The average number of motor vehicles in possession per licence of this class at the same date was 1·48, whilst the total was about 42 per cent. of the aggregate number of vehicles authorised for use for hire or reward under all types of licence (excluding licences granted to Railway Companies) in my Area.

All Limited Carriers' Licences have been reviewed for the second currency period, and about 1,000 licences as the first two months' quota had by 30th September, 1936, come under review for the third currency period.

A large number of applications for licences for the second currency period was opposed by the railway companies as they had no right of objection to the licences applied for under "claimed tonnage" rights for the first currency period; a much lower number was challenged during the first months of the third review.

It is satisfactory to note that the special conditions first attached to this class of licence have generally been appropriate to the operator's activities. In a few cases only has the condition been further restricted, whilst in some cases I have been satisfied that an extension was warranted. It is my desire to take an opportunity, at no distant date, to simplify some of the special conditions in order to facilitate the enforcement of the statutory conditions and the administrative work generally.

An analysis of the nature of merchants' businesses carried on by holders of "B" Licences and the classes of goods they are authorised to carry for hire or reward reveals that the following numbers out of the total 3,584 operators have been authorised to carry the various classes of goods indicated:—

<i>Class of Goods.</i>	<i>No. of Operators.</i>
General goods ... ..	3,172
For specified customers ... ..	434
Furniture and household effects ... ..	431
Builders', road making or excavated materials ... ..	201
Livestock ... ..	108
Coal, coke or patent fuel ... ..	80
Agricultural produce ... ..	66
Fruit, flowers, greengrocery and garden produce ... ..	63
Total of lesser numbers all under 40 where the specific authorisation is for the carriage of certain goods other than those enumerated above ... ..	265

As an operator is frequently authorised to carry more than one class of goods the total of the above figures is largely in excess of the total number of operators.

The numbers of holders of Limited Carriers' Licences carrying on the types of business stated below are:—

<i>Nature of Business.</i>	<i>No. of Operators.</i>
Colliery Proprietors, Coal and Coke Merchants ... ..	1,809
Farmers, Dairymen and Livestock Dealers ... ..	236
Fruit and Potato Merchants, Greengrocers and Florists ... ..	224
Builders, Builders' Merchants, Decorators, Public Works Contractors, &c. ... ..	174
Sand and Gravel Merchants ... ..	159
Motor Engineers, Coach Builders, Cycle Dealers and Garage Proprietors ... ..	123
Furnishers, Furniture Dealers and Upholsterers ... ..	110
No trade or business carried on other than hauling ... ..	86
Nurserymen, Market Gardeners and Garden Contractors ... ..	82
General Dealers ... ..	55
Firewood Merchants and Dealers in wood, boxes, fencing, &c. ... ..	53
Timber Merchants, Saw-Millers and Sawdust Contractors ... ..	46
Scrap metal dealers ... ..	40
Licence holders carrying on various businesses other than those set forth above ... ..	387
<b>Total ... ..</b>	<b>3,584</b>

From the above figures it will be seen that the Coal Merchant carriers in my Area constituted about 50 per cent. of the total, whereas for the country as a whole their percentage is 40. The next two classes each represents about 6 per cent., which is much the same as for the country as a whole. In the case of the building class, however, the percentage in my Area is only 5, but for the whole country the corresponding figure is 8.3 per cent.

The field of operation in which Limited Carriers are permitted to carry authorised classes of goods for hire or reward may be gathered from the following analysis:—

TABLE V.

Description of goods carried.	** Distance goods are authorised to be carried for hire or reward.					
	Not exceeding 10 miles.	10-20 miles.	20-30 miles.	30-50 miles.	50-100 miles.	Exceeding 100 miles.
General ... ..	438	1,010	747	616	182	105
Solid Fuel ... ..	28	24	11	4	—	4
Building and road making ... ..	13	56	38	39	13	22
Furniture and household effects ... ..	9	15	32	51	66	226
Livestock ... ..	—	12	8	18	18	47
Fruit, greengrocery and garden produce ... ..	1	8	6	15	5	12
Totals including the above ... ..	501	1,155	883	810	310	546

<i>Permitted class of operation.</i>	<i>No. of operators, shewing classes of goods carried for hire or reward.</i>
Goods for specified persons, with or without limit of distance.	397. Any goods for the named persons.
Goods to specified destinations.	14. General goods.
Goods in one direction only.	11. General goods.
Goods loaded within a specified district.	36. General goods. 29. Furniture and household effects.

In the remaining cases special conditions have been imposed restricting the specific commodities to meet the circumstances of each particular case.

As an operator may be authorised to carry goods of various classes with a radius appropriate to each and many are limited in other ways the total of the above figures cannot be related to the total number of operators.

#### *Private Carriers' Licences.*

12. The number of vehicles authorised under Private Carriers' "C" licences has increased from 26,244 on the 30th September, 1935, to 28,969 on the 30th September, 1936, representing an increase of 10.4 per cent. After making allowance for the dilatory attitude mentioned in the following paragraphs it still appears that the majority of the increase in commercial vehicles is in this class.

Identity certificates in respect of vehicles authorised under Private Carriers' licences in the West Midland Traffic Area were issued during the week ended the 27th June, 1936, and I caused an announcement to be made in the Press that any person who had not received an identity certificate for each vehicle authorised under a Private Carrier's "C" licence by the 29th June, 1936, should communicate with my office. It was also recommended that identity certificates should be affixed to the authorised vehicles so soon as they were received.

As was anticipated, a serious position was revealed by the necessity to display the identity certificates, for this produced many hundreds of applications for further vehicles to be authorised under Private Carriers' "C" licences, notwithstanding that the use on the highways of such vehicles without these licences had been unlawful since the 1st July, 1934. It was also found that some hundreds of private carriers had disposed of their authorised vehicles and substituted for

them other vehicles which had not been specified in their licences. In order to make the necessary variations on current licences where such existed it was essential to recall the original licence for the deletion of the registration numbers of the displaced vehicles and to specify in the licence the numbers of the replacement vehicles, but many licence holders had long since lost their licences which they had regarded as a form of receipt. The manner in which so many private carriers have regarded their licences is in keeping with their general neglect and disregard of their responsibilities under the licensing system. Communications are still being constantly received from owners of goods vehicles subject to the licensing provisions of Part I of the Act, enquiring whether it is necessary for them to apply for a licence for their goods vehicles, and many licence holders seem unable to distinguish between the licence and the identity certificate. Communications asking for the return of the licence normally result in the return of the identity certificate. It is felt that some time must necessarily elapse before the private carrier is properly educated to the elementary requirements of the licensing system, but after over two years experience the time has come when I consider the provisions of the Act with regard to the use of unauthorised vehicles and the display of identity certificates must be more stringently enforced.

In particular, the condition attaching to a Private Carrier's "C" licence that "no vehicle which is for the time being an authorised vehicle shall be used for the carriage of goods for hire or reward" will require special attention, as there are indications that it is frequently disregarded.

#### *Variations to Current Licences of all Classes.*

13. Special efforts have been made to deal with applications for vehicles by way of replacement with reasonable expedition and a minimum of inconvenience to the industry. No substantial complaints have been received with regard to any delay in the administration.

During the year 2,158 variations of Public Carriers' licences and 1,577 variations of Limited Carriers' licences were issued. It has been the tendency for licence holders to seek to acquire vehicles of greater unladen weight than the vehicles to be replaced. In the case of light vehicles, the additional unladen weight may have been attributable to the heavier construction of the more modern vehicle, whilst the heavier weight of the medium and heavy vehicles may have been due to the addition of helper springs, heavier engines, twin rear wheels, tipping bodies and other special constructional features. Bearing in mind that, generally speaking modern design in goods vehicles allows for greater loading, especially in the case of the medium weight vehicle, and taking into account the nature of the work performed, it has been my practice to facilitate as far as possible the replacement of vehicles so that the owners should not be involved in unnecessary expenditure on repairs and overhauls of vehicles which it would be better to replace. If the additional weight was due to one of the foregoing factors, or the carrying capacity was not unduly increased, or the nature of the work undertaken had not materially changed, authority was given forthwith, in the exercise of my discretion under Section 11 (3) (c) of the Act, to replace a vehicle by another of greater unladen weight provided the increase did not appear to me unreasonable after allowing for all the factors. In the case of limited carriers, regard was also had to the proportion of goods carried in connection with the trade or business carried on by the licence holder and to any special limiting conditions attached to the licence.

There has also been a tendency on the part of "A" licence holders to seek to use additional vehicles under the authority of a Limited Carrier's "B" licence although the applicant carries on no trade or business of his own. It is becoming generally recognised that a Limited Carrier's "B" licence, to which a narrow restrictive condition may be attached, is less likely to meet with opposition from other providers of transport facilities than an application for authority to use an additional vehicle under a Public Carrier's "A" licence. Moreover, the lower insurance rate for vehicles authorised under Limited Carriers' "B" licences is an added attraction to operators to apply for the limited licence instead of the Public Carrier's licence.

Limited carriers when seeking additions to their fleet display the same tendency as public carriers to follow the line of least resistance by confining

their application to the barest minimum, and to invite such restrictive conditions as may eliminate, as far as possible, any objection from other transport interests. When meeting objections at a public inquiry they are frequently prepared to have a special condition attached to the licence which restricts not only the field of operation, the nature of the goods carried, the persons for whom the goods may be carried but also combinations of such limitations. In this manner there is a growing development for each vehicle authorised under a Limited Carrier's "B" licence to have a different condition attached to its use for hire or reward. Where, however, loss of fluidity may, in my opinion, be undesirable in the public interest, in the exercise of my discretion I have frequently decided not to attach different conditions to the various vehicles but have granted a licence with one simple composite condition.

The small number of applications to vary the special conditions attached to Limited Carriers' licences is an indication that operators are not dissatisfied with their limiting conditions.

During the year 5,670 variations of Private Carriers' licences have been issued. Authority to effect replacements of vehicles authorised under "C" licences has been given expeditiously. Where traders, using vehicles for the carriage of their own goods, have forwarded their licence and the identity certificate for the vehicle to be replaced, the application has been dealt with by return of post. Although the prescribed fees are clearly stated on the application forms, many traders continue to send the maximum fee for each vehicle, necessitating the refund of some hundreds of portions of fees during the year.

The large number of variations issued cannot be regarded as any criterion of the volume of vehicles replaced during the year, as, following the issue of identity certificates in June, 1936, for display on "C" vehicles, it was disclosed that many vehicles had changed hands as long ago as July to December, 1934.

#### *Temporary Replacement of Vehicles.*

14. Advantage has not been taken to any great extent of the provisions of Regulation 15 of The Goods Vehicles (Licences and Prohibitions) Regulations, 1936, as only 32 applications have been received for the substitution of vehicles whilst authorised vehicles are under repair. Small operators state that they have experienced difficulty in securing a suitable vehicle for use whilst their own is under repair, and operators of larger fleets, including the Railway Companies, prefer to apply for a proportionate number of vehicles to be authorised for use under the licence as a special maintenance margin.

#### *Evidence at Public Inquiries.*

15. The average applicant attending a public inquiry for the first time in support of his application appears to be totally unaware of the evidence required to succeed. In many cases they appear without any documentary or personal support and rely only upon an honest explanation of their difficulties. They are thoroughly convinced of the need for seeking to place additional tonnage on the road and feel that they are suffering under a hardship when their application is refused on the grounds of lack of evidence.

In other cases where applicants are represented by Association officials or Solicitors, it has been apparent that their advocates have not been instructed until the last possible moment, sometimes even not until the previous case has been called at the Inquiry. The presentation of applications at Public Inquiries is becoming inevitably more and more a matter requiring legal advice.

At the beginning of the year under review, it was possible to determine between 30 and 40 applications in one day, but with the tendency for contested cases to become heavier and more complex it has been necessary to allot approximately 12 applications to be heard in a day. On occasion, a whole day or more than one day is required to be set aside for the hearing of an application which is strongly contested.

It is worthy of note that when established carriers are applying for additions to their fleet they have admitted that they have only recently commenced to keep tonnage figures and detailed particulars of gross receipts of their haulage businesses.



*Public Inquiries.*

16. During the period under review 156 public inquiries, occupying 159 days, have been held in my Area for the purpose of considering applications for licences. Dr. W. Dawson Sadler, M.A., LL.D., Barrister-at-Law, as my deputy in accordance with the appointment you made in January, 1935, has determined a large number of the applications for both Public and Limited Carriers' licences, especially those from operators whose bases are located in Staffordshire.

Inquiries have been held at various centres as follows:—

Birmingham	...	...	...	...	...	...	...	89
Coventry	...	...	...	...	...	...	...	14
Hanley	...	...	...	...	...	...	...	28
Hereford	...	...	...	...	...	...	...	2
Shrewsbury	...	...	...	...	...	...	...	10
Wellington	...	...	...	...	...	...	...	2
Worcester	...	...	...	...	...	...	...	11
Total ...								156

At these public inquiries 3,242 applications for licences or variations thereto were listed for hearing during the year, an average of 20 applications a day, and objections lodged in 2,801 of these cases were taken into consideration in arriving at the decisions.

*Licensing Authority's Reasons in Writing under Section 6 (3) and Appeals under Section 15 of the Act.*

17. During the period under review four applicants have asked for reasons in writing for the decision on their applications, but no appeal followed in any of these cases.

Two appeals were lodged by the Railway Companies as objectors to variations to Public Carriers' licences; one of these was dismissed and one was allowed.

The Railway Companies also appealed and were successful in opposing an additional vehicle authorised under a Limited Carrier's licence in one instance and in obtaining a restrictive condition in another case. Thus there was a total of four appeals against my decisions and those of my deputy. The London Midland & Scottish Railway Company were appellants in all four cases and were supported by the Great Western Railway Company in two of them.

I have the honour to be, Sir,

Your obedient Servant,

A. S. REDMAN,

Licensing Authority.

## EAST MIDLAND TRAFFIC AREA

To the Minister of Transport.

SIR,

In accordance with Section 23 (4) of the Road and Rail Traffic Act, 1933, I have the honour to make to you my second Annual Report, as Licensing Authority for the East Midland Traffic Area, established under Section 4 of that Act.

The report covers the period 1st October, 1935, to 30th September, 1936.

### *Description of Area.*

1. The East Midland Area is an elongated area, its length being about 150 miles whilst its width varies from 30 to 90 miles. It includes, in general terms, the Counties of Lincoln, Nottingham, Derby, Leicester, Rutland, Northampton, Oxford, and Buckingham, and the County Boroughs of Derby, Grimsby, Leicester, Lincoln, Northampton, Nottingham and Oxford. The roads are up to the average standard of the country and are not unduly difficult except perhaps in parts of Derbyshire where gradients are steep in places, and in parts of Lincolnshire where the roads although flat are tortuous. The L.N.E.R. and L.M.S. serve the greater part of the Area, the South Western portion being served by the G.W.R. The river Trent is an important waterway in the northern part of the Area.

Large tracts are purely pastoral and agricultural, notably Lincolnshire, but there are industries of considerable size carried on in the large towns, such as motor cars near Oxford; boots and shoes at Northampton and District; coal, iron and stone quarrying, pharmaceutical products, tobacco, cycles, artificial silk, hosiery and kindred industries at Derby, Leicester and Nottingham; engineering and agricultural implements, etc., at Grantham, Lincoln and Gainsborough; importing of timber at Grimsby and Boston; and production of steel at Scunthorpe.

The Area is also a corridor for traffic from the North, North West and West Midlands to London and there is a tremendous amount of through traffic on roads A1, A5 and A6, by road vehicles not licensed in this Area. On a recent inspection of records at Newark on the trunk road A1, it was found that during certain hours of the night goods vehicles were passing at the rate of thirty an hour, but not more than one or two were licensed in this Area.

### *Inquiries.*

2. Seventy-three public inquiries were held at the under-mentioned towns, the inquiries occupying 73 days:—Aylesbury 1; Boston 1; Derby 8; Grimsby 5; Leicester 15; Lincoln 7; Northampton 6; Nottingham 21; Oxford 8; Skegness 1.

A number of meetings of operators were held and addressed by senior members of my Staff with a view to making the provisions of the Act better known.

### 3. STATISTICS.—*Applications for Carriers' Licences.*

Nature of application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ... ..	14	352	31	222	22
Short Term, Section 3 (3) ...	1	18	—	16	—
Contract ... ..	2	168	—	169	1
"B" Licences :—					
Currency Period ... ..	54	3,768	91	3,227	56
Short Term, Section 3 (3) ...	2	22	1	22	—
"C" Licences :—					
Currency Period ... ..	20	2,260	—	2,261	—
Short Term, Section 3 (3) ...	—	93	—	93	—

	Licences.		
Applications (included above) in respect of which a holding Company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ...	"A": —	"B": —	"C": —
Applications (not included above) to which Section 12 applies	—	—	"C": 20
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ...	"A": 90	"B": 40	
Short Term Administrative Licences issued (Section 3 (4) ) ...	"A": 52	"B": 1,306	
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ...	"A": 13	"B": 4	

The regulation came into force on 1st May, 1936)

*Applications for variation of Carriers' Licences.*

Nature of variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles "A" Licences :—					
Published and dealt with at Inquiry ...	} 69	} 1,748	60	180	34
Published but determined without Inquiry ...			8	40	—
Not published (Section 11 (3) (a) and (c) ) ...			—	1,433	—
"B" Licences :—					
Published and dealt with at Inquiry ...	} 41	} 1,156	35	101	11
Published but determined without Inquiry ...			3	43	—
Not published (Section 11 (3) (a) and (c) ) ...			—	979	—
Variations of Conditions attached to "B" Licences...	22	139	23	90	20

It will be remembered that in accordance with the provisions of the Act, "A" licences are issued for two years, "B" licences for one year, and "C" licences for three years. The position of licences current at 30th April, 1936, is shown in paragraph 9.

Many applications for new licences by "newcomers" to the industry and for additional tonnage by holders of both "A" and "B" licences have had to be refused for lack of sufficient evidence.

For some time past I have published in "Applications and Decisions" a notice calling the attention of applicants to recent decisions of the Appeal Tribunal and advising them to be prepared to give such information as the Tribunal consider necessary. It is to be hoped that applicants will take this advice seriously and save themselves much time and inconvenience.

The following licences were issued during the year :—

	"A"	"B"
Currency Period ...	285 (656 Vehicles)	3,265 (4,660 Vehicles)
Contract ...	169 (213 " )	—
Short Term ...	14 ( 16 " )	18 ( 19 " )
Short Term (Administrative) ...	52	1,306

Variations were issued as under :—

	"A"	"B"	"C"
Currency Period ...	1,617	1,202	4,564
Administrative Short Term ...	—	80	—

Of the above-mentioned variations 1,377 A and 990 B were issued free of charge since the number of authorised vehicles was not increased thereby.

Sixty-two A and 63 B duplicate licences were issued.

As was the case in the previous year a number of applications were received just before Christmas asking that vehicles licensed under a "C" licence might be permitted to be used for hire or reward under contract with the Postmaster General for the carriage of mails. Twenty-seven such applications were received and granted by virtue of Section 2 (4).

There were no revocations or suspensions of licences during the year as I was anxious to give hauliers an extended opportunity to put their affairs in order before taking drastic action, but a reference to the steps taken by my staff to enforce the provisions of the Act and Regulations (Paragraph 12) shows that a large number of successful prosecutions have been undertaken, and I shall bear these in mind when dealing with the delinquents' applications in future.

#### *Objections.*

4. 75 per cent. of the applications for new "A" and "B" licences were opposed.

78 per cent. of the published applications for variations were opposed.

30 per cent. of the applications for renewals (mainly "Bs") were opposed.

84 per cent. of the objections to applications for "A" licences were pursued.

76 per cent. of the objections to applications for "B" licences were pursued.

Noteworthy amongst the objectors was a Furniture Removers Association in one town who endeavoured to secure a substantial reduction in the radius allowed to "B" licence holders for the carriage of furniture and household effects. In another part of the Area a Transport Association entered many objections on behalf of its members, but the principal objectors were the Railway Companies.

There has been, however, a large decrease in the number of objections. Recently the objections to applications for renewal of licences has fallen to about 5 per cent.

#### *New Applications.*

5. Of the applications dealt with during the year:—

<i>A</i>	<i>B</i>	
31	49	were withdrawn.
22	42	were refused.
19	188	were granted.
—	—	
72	279	
—	—	

#### *Appeals.*

6. Eleven appeals were lodged. Of this number five were against the grant of a licence. Two of these were abandoned, and no decision has yet been given on the remaining three.

Two were against the grant of a variation. The decisions have not yet been given.

Three were against refusals to grant variations. Two were abandoned and the third was dismissed.

One was against a refusal to grant a licence. No decision has yet been given.

In the cases of appeals against the grant of licences and variations all the appellants were Railway Companies. In other cases the appellants were the applicant hauliers.

#### *"Transfers" and Surrenders of Licences.*

7. One hundred and ten Class "A" licence holders (equal to five per cent.) surrendered their licences during the year. Of these 99 were bought out and new licences were granted to the purchasers, mainly under Section 11 (3) (b), the remaining 11 ceased operations on account of bankruptcy or because their vehicles were reclaimed by the Finance Companies interested in the hire purchase system of payment.

Three hundred and forty-two Class "B" licence holders (equal to 11 per cent.) surrendered their licences. Of this number 232 ceased business entirely, 65 took out "C" licences instead and 45 licences were "transferred" to purchasers, mainly under 11 (3) (b).

With regard to "C" licence holders, since the commencement of the Act 122 have surrendered their licences and are using private cars and trailers instead;

438 have formed their businesses into limited companies or formed partnerships;

146 have been granted "B" licences;

628 have gone out of business.

Many applications for "C" licences were received when it became necessary for the vehicles to exhibit an identity certificate.

#### *Licence Holders at 30th April, 1936.*

8.

				<i>Per cent.</i>
"A" Licences—Currency and Short Term	...	...	2,014	10.76
"A" " " Contract	...	...	191	1.02
"B" " " Currency and Short Term	...	...	3,127	16.70
"C" " " Currency and Short Term	...	...	13,392	71.52
			<u>18,724</u>	<u>100.00</u>

#### *Licences and Vehicles at 30th April, 1936.*

9.—(i) "A" licences (including Short Term).

The number of these licences was 2,030 (including three issued to railway companies) authorising 5,590 motor vehicles (595 belonging to railway companies) and 535 trailers (248 for railway companies). The average number of vehicles per licence was 3.01.

(ii) "A" Contract licences.

Including one licence authorising one motor vehicle granted to a railway company, there were 203 of these licences authorising 277 motor vehicles and 24 trailers. The average number of vehicles per licence was 1.48.

(iii) "B" licences (including Short Term).

No "B" licences were issued to railway companies. There were 3,128 of these licences authorising 4,504 motor vehicles and 88 trailers. The average number of vehicles per licence was 1.47.

(iv) "C" licences (including Short Term).

No "C" licences were issued to railway companies. There were 13,395 of these licences authorising 25,662 motor vehicles and 539 trailers. The average number of vehicles per licence was 1.96.

(v) All licences.

For all licences combined the figures were:—Licences, 18,756; Motor Vehicles, 36,033; Trailers, 1,186; Vehicles per licence, 1.98.

Of the 1,794 licence holders excluding railway companies who hold "A" licences, only 1,017 or 56 per cent. have only one vehicle, whilst in the case of "B" licences the numbers are 2,554 licence holders, 2,032 with only one vehicle, giving a percentage of nearly 80.

#### *"B" Licences—Conditions and Business of Holders.*

10. Of the 3,127 holders of "B" licences on 30th April, 1936, 1,545 or nearly 50 per cent. were coal merchants, while there were 258 dairymen and livestock dealers, 181 builders and contractors, and 102 furniture dealers. One hundred and twenty-two had no other business.

Out of a total number of 5,016 conditions (commodities) enumerated on the licences, General Goods appeared 2,240 times, Furniture and Household Effects

662, Goods for specified customers 496, Building Materials 452, Coal and Coke 319, Agricultural produce and requisites 256, and Livestock 189.

Again referring to the 5,016 conditions, 688 gave a radius of 10 miles, 1,077 not exceeding 20, 1,125 not exceeding 30, 769 not exceeding 50, 315 not exceeding 100, and 449 100 miles or over.

The most frequent radii appearing against the most frequent commodities were:—

General Goods, not exceeding 20 miles,  
Furniture and household effects, 100 miles or over,  
Goods for specified customers, 100 miles or over,  
Building materials, not exceeding 30 miles,  
Coal and Coke, not exceeding seven miles,  
Agricultural produce and requisites, not exceeding 30 miles,  
Livestock, 100 miles or over.

#### *Maintenance of Vehicles.*

II. The standard of maintenance of goods vehicles shows a continuous improvement since the licensing system inaugurated by the Act of 1933 came into force. During the year 16,175 vehicles have been inspected, some by appointment, some by surprise visits to garages, some by checking specified points on roads with the assistance of the police, and some when the vehicles were stationary on roads or in market places. At some markets in the area as many as 200 vehicles are seen and those which appear to warrant it are inspected. I have heard that local "stockists" notice a definite improvement in their sales after such a visit, whilst a large number of new vehicles have been purchased to replace those found on inspection to be defective. It can be stated definitely that although many vehicles in a poor condition remain, their number is being steadily reduced.

Some firms whose vehicles seemed to need attention have had the whole of their fleets inspected. In most cases they have adopted a very reasonable attitude, purchased new vehicles and made better provision for their maintenance. One firm has informed me that since the visit of my Vehicle Examiners they have put their house in order and are now only having one per cent. of the breakdowns formerly experienced.

A visit to a Circus which had been praised for its vehicles in a weekly trade paper ended in five prohibitions being issued. Amongst other things it was found that the trailer brake cables were made of soft iron fencing wire, while the lions and tigers were in cages fastened with pieces of wire—surely a dangerous load.

A further interesting result of the work of the Vehicle Examiners is the improvement of work of repairers. In the early days of prohibitions of vehicles as many as six visits would have to be paid to a workshop before the vehicle could be released. Return visits are now not so frequently necessary. It is becoming known that unless *all* the defects are remedied the prohibition will not be lifted. Nevertheless, during 1935/36, it was necessary to pay a second visit in 375 cases, and a third visit in 120 cases before the prohibition was released. In some directions a removal of prohibition notice (G.V.10) is acquiring a commercial value. It is being regarded as a certificate of fitness.

During the year nearly 1,500 vehicles (9.3 per cent. of those inspected) were prohibited by my Vehicle Examiners, of which number 90 per cent. were effective immediately, the remainder being delayed. The principal defects found were backlash in steering and inefficient brakes, but there was a large number of chassis which had become defective through overloading, particularly in the case of vehicles used in keenly competitive traffic such as road materials, building materials, and sugar beet. In one instance a vehicle of an unladen weight of 3 tons 12 cwt. was found to be carrying a pay load of 9 tons 1 cwt.

The majority of prohibitions issued have been in respect of vehicles of an unladen weight not exceeding 50 cwt. There are, of course, more vehicles in this class than there are heavy motor cars, but the proportion of prohibitions issued in respect of vehicles over 50 cwt. unladen weight is also relatively smaller.

A reference to the list of prosecutions shows that there were 155 summonses for generally dangerous vehicles, 49 for defective brakes only, and 13 for using a goods vehicle for the carriage of goods whilst a prohibition notice was operative.

### *Enforcement.*

12. During the year under review the Enforcement staff has been strengthened by the addition of three Traffic Examiners and corresponding indoor staff. The Traffic Examiners are now stationed in various parts of the Area in the same manner as are the Vehicle Examiners, but not in the same towns as the Vehicle Examiners, in order that the available staff shall be as widespread as possible.

Various methods have been adopted by the Enforcement Section, for example, where it was suspected that excessive hours were being worked and records being falsified, vehicles have been followed. Alternatively, where the routes were known the vehicles have been checked at various points along the routes. Certain traffics have received special attention such as Bricks, Pipes, Timber, Tarred Slag, and Steel, with results leading to numerous prosecutions. Many hauliers are attempting to do long-distance runs without a change of driver, thereby compelling the driver to speed and work long hours. The law-abiding long distance hauliers on regular runs arrange for a change of driver en route or for shunt drivers at the termini. I conceive it to be my duty to protect such from the unfair competition of the others.

Checks have been undertaken by day and by night in conjunction with the Police, such checks revealing amongst other things neglect of records and infringements of the conditions of licences.

"C" licence holders appear to be particularly negligent as regards records although the amount of information required in their case has been reduced to a minimum. The advent, too, of discs for "C" licences showed that a large number of vehicles were being used without a licence.

### *Records and Hours.*

Very many drivers still fail to appreciate the importance of entering as they occur the particulars required in their records. Unless the entries are made as and when the information is available the records lose much of their value. It is feared, too, that other drivers do not yet realise that it is in their own interest that a correct record should be made. This may be in some part due to the fact that no provision is made in the Act of 1933 for the punishment of making false entries in the records except that which relates to an offence for failing to keep a current record and I suggest, for your urgent consideration, the desirability of strengthening Section 16 or Section 34 of the Act accordingly.

Complaints are continually being received from drivers and drivers' wives that the former are compelled to work excessive hours, but that they have either to disobey the law or be dismissed from their employment. Complaints, too, are received from other hauliers of the unfair competition to which they are subjected by such disregard for the law.

It is hoped that the increased staff at my disposal will effect an improvement in this connection. A technique is being developed as a result of experience gained in the detection of offences, which has become increasingly successful.

### *Speed.*

I regret to have to report that there is still much speeding indulged in by drivers of commercial vehicles. Sometimes it is the result of time mis-spent by the drivers, in other cases, however, it is because the employers have not allowed the drivers sufficient time for the journeys. It is not at all unusual to discover in cases where prosecutions are undertaken in respect of excessive hours being worked that the journeys could not possibly have been performed in the time if the law with regard to speeds were observed. It is quite clear that in the future more notice will have to be taken of this class of offence than has been the case in the past.

*Prosecutions.*

During the year the following prosecutions in respect of goods vehicles or drivers' records have been successfully undertaken by me or by the Police in cases where my officers were concerned as witnesses:—

*List of Prosecutions authorised by the Licensing Authority or where a witness attended from this office. 1st October, 1935—30th September, 1936.*

Offence. (Section of Act and/or Regulation).	Cases decided. No. of Summonses.	Total fines. ..	Costs. (Awarded additional to fines.)	Out of which the L.A. was allowed.	Dis-missed.	Cases pending. Court date fixed.	Solicitors instructed. Dates of hearing not fixed.
Records (Reg. 6 and 8 of G.V. (Keeping of Records), Regs., 1935) ... ..	514	£ s. d. 371 3 0	£ s. d. 25 7 6	£ s. d. 14 1 0	2	18	18
Excessive hours (Sec. 31 R. & R.T. Act, 1933. Sec. 19 R.T.A., 1930) ... ..	344	364 7 6	85 10 0	70 15 6	—	41	82
Dangerous vehicles (Reg. 62 and 85. C. and U. Regs., 1931) ... ..	155	212 16 6	41 16 6	30 7 6	3	9	—
No Carrier's licence (Sec. 1. R. & R.T. Act, 1933) ... ..	125	79 0 0	26 12 0	17 5 6	—	1	—
Brakes inefficient (Regs. 63 and 85. C. and U. Regs., 1931) ... ..	49	59 4 0	8 3 10	6 17 10	—	4	—
No H.G.V. driving licence (Sec. 31 R.T.A., 1934) ... ..	30	51 5 0	11 18 0	9 18 0	—	—	—
Breach of Carrier's licence (Sec. 8-9 R. & R.T. Act, 1933) ... ..	25	31 15 0	25 15 9	18 0 3	2	1	1
Identity disc not displayed (Reg. 12. L. and P. Regs., 1936) ... ..	22	12 10 6	10 4 6	7 19 6	2	—	—
Using vehicle whilst under Prohibition (Sec. 17 R. & R.T. Act, 1933) ... ..	13	18 14 0	7 11 0	7 4 0	—	1	—
Miscellaneous ... ..	23	30 5 0	6 3 0	2 12 2	1	—	—
	1,300	1,231 0 6	249 2 1	185 1 3	10	75	101

Of the ten cases dismissed, one was at the Assizes at Nottingham where the Judge held that there was insufficient corroboration to support a charge under the Perjury Act, 1911, against an employer for suborning a driver to falsify his record. Two cases were dismissed because they were the first of their kind at the Court, and other charges were found proved and convictions recorded at the same time. In six cases, I felt that there was evidence produced in Court enabling the Magistrates to come to the decisions they did, but in the remaining case I have appealed to the High Court.\*

The number of prosecutions undertaken in 1935-36 is nearly treble the number undertaken in 1934-35. As indicated at the end of paragraph 3, I have not yet exercised my powers of suspension or revocation under Section 13 of the Act, but if these prosecutions fail to have a deterrent effect, if hauliers think it cheaper to disobey the law and pay fines when caught, then the much more drastic penalty provided by Section 13 will be applied. Section 13, of course, is applicable to "C" licences as well as to "A" and "B" licences.

*Wages.*

13. Hopes that were entertained that the appointment of a Joint Conciliation Board would result in the fixing and enforcement of minimum wages to drivers received a severe set-back as a result of a decision of the Industrial Court on a case which arose in my Area. You will be aware that Section 32 (1) of the Act

\* The result of the Appeal heard in October, 1936, was in my favour.



of 1933 provides that the Industrial Court in arriving at a decision when a question of what are fair wages and conditions is referred to it shall have regard to any determination which may be brought to its notice contained in a decision of a Joint Conciliation Board or Agreement between organisations representative of employers and workpeople.

In May, 1934, the National Joint Conciliation Board for the Road Transport Industry (Goods) was set up and consisted of 15 representatives of employers and 15 representatives of workpeople. Among the functions of the board was the following:—

“ . . . to determine wages, hours and working conditions of labour and to set up standard conditions under which such wages or working conditions may be determined nationally or otherwise for the operative grades of workpeople employed in the road transport industry.”

During the summer of 1934 a sub-committee of the Board met and laid down the wages and conditions which it thought should be accepted, making provision for various grades, the grade to be adopted in each traffic area being left to the determination of the local Joint Conciliation Board. A Joint Conciliation Board for the East Midland Traffic Area provisionally adopted Grade 2 as being appropriate to its Area and these rates were to have come into force on 1st January, 1935. The local Board, however, failed to reach agreement as to the final grading for the Area and the matter was referred to the Appeals Committee of the National Joint Conciliation Board which found at its meeting in December, 1935, as follows:—

(a) That the Cities of Nottingham and Leicester shall be GRADE 1.

(b) That the town of Derby shall continue to operate, for the time being, on the Interim Grading, viz., GRADE 2, and the East Midland Area Board shall re-examine and determine whether this town shall be included in GRADE 1.

(c) That the remainder of the Counties of Derbyshire, Nottinghamshire and Leicestershire, West of the line drawn from Bawtry, Retford, Southwell and Melton Mowbray, and thence to the boundary where the East Midland Traffic Area joins the Eastern Traffic Area, shall be GRADE 2.

(d) That Lincolnshire and East of the above line shall be GRADE 3, with the exception of the following towns, which shall be GRADE 2:—

Scunthorpe, Lincoln, Cleethorpes, Boston, Grimsby, Grantham.

(e) That GRADE 2 shall operate within a radius of 15 miles from the centre of Wellingborough.

(f) That Oxford shall be GRADE 2.

(g) That the remainder of the East Midland Traffic Area not specified in the foregoing shall be GRADE 3.

A representation was received by me from the Transport and General Workers' Union in January, 1936, that a firm in Oxford were not paying fair wages. It was alleged that this firm was paying Grade 3 wages whereas according to the agreement arrived at by the Area Board the rate should be Grade 2. I passed the matter to the Chief Conciliation Officer appointed by the Minister of Labour who endeavoured to effect an agreement between the parties. These endeavours having failed, the matter was referred by the Minister of Labour to the Industrial Court in July, 1936. The case was heard in London on the 15th and 16th September, 1936, when the Court came to the conclusion that as the rates laid down by the Conciliation Board had never become operative in Oxford, and as the firm were paying the wages commonly paid by firms engaged in the Road Haulage industry in Oxford, it could not be said that the firm in question were acting in breach of Section 93 (1) of the Road Traffic Act, 1930, as amended and extended by Section 32 of the Road and Rail Traffic Act, 1933, which oblige a licensee to pay “ fair wages ”.

Many complaints are received from drivers and hauliers that their employers or competitors respectively, are not paying the wages laid down by the Conciliation Board. These have been referred to the Area Joint Board for consideration.

Four representations from "Organisations representative of the persons engaged in the Road Transport Industry" were made in proper form and forwarded to the Chief Conciliation Officer.

Three were, in due course, satisfactorily settled without recourse to the Industrial Court, the employers agreeing to pay the Wages laid down by the Conciliation Board.

The Joint Committee appointed by you and the Minister of Labour to examine the present position in regard to the regulation of wages in the industry will no doubt give consideration to the desirability of improving the procedure by which standards of wages may be arrived at and of their enforcement in the minimum possible time.

..

*Licensing of Drivers of Heavy Goods Vehicles.*

14. My anticipation that there would be 7,000 applicants for these licences has been more than justified for at the 30th September the number of licences current was 7,989.

During the year under review the number of applications received was 5,122, which together with the number of 563 which fell to be dealt with from the preceding period have been disposed of as follows:—

Licences granted	5,059
Applications withdrawn	348
Applications refused	158
Licences not taken up	5
Outstanding at 30th September, 1936	115
	5,685

The number of applicants who withdrew their applications when it was pointed out to them that they would need to undergo a driving test accounts in the main for the number of 348; and the number of 158 applications refused is analysed as follows:—

Failed to pass test	15
Failed to arrange test	109
Under age	6
Failed to reply	28
	158

No request for re-consideration of decision to refuse a licence was received. In the case of a licence which was revoked the holder appealed against the revocation but failed to appear on the date fixed for the hearing of the appeal. Ten licences were suspended during the year. Three were due to the suspension of their ordinary driving licences on conviction by a bench of magistrates, two owing to the holders having made false statements on the form of application, one on account of physical disability, and four under Section 31 (7) of the Act for misconduct. In the case where the holder suffered physical disability, the disability consisted of blindness in the right eye. The applicant had claimed the grant of the licence as a right under Section 31 (6) and when it was ascertained that he suffered from this disability the licence was suspended until he had passed a driving test, which he did.

The number of tests conducted by the Vehicle Examiners numbered 1,605. Successful tests were 1,416, and failure to pass tests amounted to 189. This latter number is made up as follows:—

Failure to pass first test but subsequently passed later test	138
Failure to pass first test and awaiting further test	21
Failure to pass first and second test and applications refused	15
(It is the custom in this Area to give applicants an opportunity to undergo two tests before finally deciding the applications. In these circumstances the figure of 15 shown above represents 30 tests.)	

Included in the figure of 1,605 mentioned above are 116 non-vocational driving tests carried out by the Vehicle Examiners who issued 106 Certificates of Passing and 10 Statements of Failure.

In addition 343 tests were reported to me by the 29 Examiners employed by eight companies whose tests I have agreed to accept for the purposes of Section 31 (5) of the Act.

The total number of women drivers has now increased to four, two of whom are haulage contractors while the other two generally drive horse boxes.

The number of offences reported by the Police Authorities in relation to heavy goods vehicle drivers does not decrease. The majority of the reports are in respect of failure to observe the law as to speed limits. Holders of licences who thus offend are reminded of the powers of Licensing Authorities to suspend or revoke licences and where the holder of a licence is reported on more than one occasion he is asked to furnish an explanation of his conduct.

#### *The Neighbouring Farmer.*

15. Last year I referred to the serious competition caused to holders of "A" and "B" licences by farmers who held "C" licences and operated their vehicles for hire or reward by virtue of Section 1 (5) (c). Such competition is growing as the possibilities of the Section become more and more widely known and understood by "persons engaged in agriculture." In one instance Haulier A sold his business to Haulier B, who within a short time lost it to Farmer C, who learning what he could do with a "C" licence, applied for two more "C" licences and carried the traffic.

Some of the difficulties which arise out of this Section will be appreciated from the following case:—

The licensee of a village inn applied to me for a "B" licence to carry, amongst other things, road materials. A large number of local hauliers objected, with the result that after hearing the case I granted a "B" Licence limited, when the vehicle was being used for hire or reward, to the carriage of manure from a Co-operative Society. The Licensee then took over a small farm and very soon it was reported to me that he was carrying road materials for the Parish Council. Being satisfied, after making full enquiries, that such was the case, I prosecuted. The defence, however, was that the order for the carriage of the road materials was given by the Chairman of the Parish Council who was a neighbouring farmer, and the defendant thought that he was giving the order as a farmer. The Bench accepted the explanation and the case was dismissed.

#### *Trailers drawn by Private Cars.*

16. Another matter upon which I commented last year was the loop-hole provided by Section 1 (7) (b) of the Act and of its exploitation by farmers and others. The recent issue of discs to holders of "C" licences has revealed that a large number of persons who formerly used goods vehicles for the carriage of goods have given up their goods vehicles and are now using private cars with or without trailers.

#### *Haulage of Beet.*

17. The haulage of Beet is an important feature in certain parts of this Area each year from October to January, and I am frequently called upon to make provision for the necessary tonnage. In order that I might be fully informed of the acreage under cultivation for the past two years I asked the Ministry of Agriculture and Fisheries to supply me with authentic details. From this it appears that the acreage under beet in England and Wales for 1936 was less by about 3 per cent. than in 1935 (356,798 against 367,210) while in Lincolnshire there is an increase of about 5½ per cent. (73,025 against 69,260). The yield per acre is expected to be the same, i.e., about 9.1 tons an acre. Assuming the average load carried to be four tons, 165,232 journeys are required to move the beet alone. As these journeys have to be made in three or four months considerable organisation is necessary to carry out the work successfully, both by road and rail.

*The Wheat Marketing Scheme.*

18. My attention has from time to time been drawn to this scheme by applicants for licences. I am informed that the object of the Wheat Act, 1932, was to establish a standard price and a secure market for home grown wheat of millable quality. The Wheat Quota Scheme was in no way to interfere with the free market or the business of buying and selling of wheat. A farmer is free to negotiate for the sale of his wheat and to obtain the best price he can from the corn merchant, miller or other buyer just as he did before the Act came into force. To obtain deficiency payments, however, he has to register with the Wheat Commission and keep records of his sales. It appears, therefore, that it sometimes pays a grower to sell his own wheat, claim the deficiency payment and buy for seeding purposes. ..

Because of this, the quantity of wheat to be transported in this Area has increased of recent years, and a large amount is carried short distances only.

*Rates.*

19. Two interesting sidelights on this subject are perhaps worthy of report. The first is that some firms requiring transport are very willing to supply applicants for licences with letters for production at my inquiries saying that they are willing to give work to the applicant if he is successful in obtaining a licence. So many such letters do some firms give out that they might well have them produced by a copying machine. I can attach little importance to these letters when unsupported by witnesses, and I have a strong suspicion that the firms in question are desirous of getting as many vehicles as possible on the road with a view to securing greater competition—in my view wasteful competition—and therefore reduced rates.

The other is that I heard on numerous occasions how important it was that potatoes should go from Lincolnshire to London by road in order that they should be in market at a certain time. Additional vehicles were granted when supported by such evidence. Subsequently I was surprised to learn that an applicant in the same district for a licence with a radius of 15 miles was being opposed by hauliers who had been concerned mainly with the potato traffic to London. On making inquiries into the matter I learned that the railway company had reduced their rates for potatoes and secured the traffic to rail transport. The Hauliers who previously carried the potatoes are now competing for the traffic to the local stations.

*Passing of the Horse.*

20. During the year a number of applications were received from owners of horse transport to replace by motor lorries and in almost every case such applications were granted. It was pointed out to me by most of such applicants that although they had resolutely declined to mechanise their transport because they had always been accustomed to horses, they were being forced by economic conditions to bring their transport up to date. This change-over from horses to motors has been carried out by the Railways during the past two years to a very large extent.

*Thanks.*

21. I wish to acknowledge the great assistance I have received from the police authorities in my Area, and the help and co-operation of the Associations of operators, who have been ready and willing at all times to do whatever they could.

Local Authorities have willingly placed Court Rooms at my disposal for the holding of my many public inquiries and I desire to tender to them my grateful thanks.

The Clerk to the Licensing Authority and his Staff, the Certifying Officer and Vehicle Examiners have cheerfully undertaken the extra work imposed upon them, and to all of them I wish to record my appreciation.

I have the honour to be, Sir,

Your obedient Servant,

J. H. STIRK,

Licensing Authority.

## EASTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

I have the honour to report my proceedings, for the year ended the 30th September, 1936, as Licensing Authority for the Eastern Traffic Area, appointed under Section 4 of the Road and Rail Traffic Act, 1933.

### *Public Inquiries.*

2. Sixty-four Public Inquiries, occupying 64 days, were held at the following centres:—Bedford (3), Cambridge (21), Chelmsford (7), Colchester (5), Ipswich (8), Norwich (15), Peterborough (5). I have endeavoured, as far as possible, to give applicants for licences or for the variation of licences the opportunity of attending at the centres most convenient to them.

3. All applications subjected to objection and those which, in my judgment, required investigation in public, were heard at Public Inquiries. Whilst the Railway Companies were the principal objectors to applications for licences or for the variation of licences, a number of objections were lodged by other interested road operators. It is noticeable, however, that road operators who would appear to have grounds for objection are not taking full advantage of the opportunities the licensing procedure affords them to be heard in defence of their interests as licensees. In this connection it is interesting to note that with approximately 3,500 "A" or "B" Licensees in the Area only about 120 licensed haulage operators receive copies of "Applications and Decisions."

4. The numbers of objections lodged and pursued compared with the numbers of applications received and published are shown in the following Table No. I.

**TABLE I.—Objections Lodged and Pursued against Applications Published.**

Applications for.	"A" Licences.			"B" Licences.		
	Applications published.	Objections lodged and pursued.		Applications published.	Objections lodged and pursued.	
		Total No. received.	No. of applications objected to.		Total No. received.	No. of applications objected to.
	No.	No.	No.	No.	No.	No.
Currency Period Licences ...	314	155	68	1,918	396	315
Variations of Licences (pub- lished) ...	229	169	60	149	110	89
Short Term Licences ...	161	31	29	61	20	14

### *Statistics.*

5. The following statistical tables contain, in summarised form, particulars of the applications received for Carriers' Licences or for the variation of licences.

Information is also given as to the numbers of licences current, the number of licence-holders, and the numbers of vehicles licensed.

TABLE II.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
	No. **	No.	No.	No.	No.
"A" Licences :—					
Currency Period ... ..	25	314	27	59	33
Short Term (Section 3 (3) of Act) ... ..	44	161	14	137	6
Contract ... ..	—	105	—	102	—
"B" Licences :—					
Currency Period ... ..	560	1,918	51	2,032	67
Short Term (Section 3 (3) of Act) ... ..	11	61	4	50	3
"C" Licences :—					
Currency Period ... ..	—	1,677	—	1,660	—
Short Term (Section 3 (3) of Act) ... ..	—	122	—	122	—

6. At the close of the year, on the 30th September, 1936, there were 220 Currency Period "A" Licence applications and 328 Currency Period "B" Licence applications not decided. Of these applications 203 "A" and 292 "B" applications were for the regrant of licences due after the 30th September, 1936. The 48 "A" Short Term and the 15 "B" Short Term applications not dealt with concerned mainly licences for the sugar beet season October to December, 1936.

7. The applications for Carriers' Licences shown in the above table include 18 "A" applications and 7 "B" applications for licences, to which the provisions of paragraph (b) of Section 11 (3) of the Act of 1933 applied (i.e., applications for a licence in connection with a business which the applicant has acquired or intends to acquire), which were dealt with without publication in Part I of "Applications and Decisions." The decisions in the cases referred to were published in Part III. It has been the general practice to publish applications for licences where the applicant sought to acquire an existing haulage business, but the circumstances in the 25 applications not advertised were such that there could be no reasonable grounds for objection or need for investigation in public.

8. During the year the only Short Term Administrative Licences issued were six Limited "B" Carriers' Licences.

9. Applications to take advantage of the provisions of Section 12 of the Act were received from two Holding Companies. The applications, which were granted, referred to four "A" Licences and one "C" Licence.

10. No Short Term Licences were issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) of the Act of 1933 and Regulation 15 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936). The normal machinery for the variation of licences in order to effect a change of vehicles sufficed for the few applications received for these licences.

TABLE III.—*Applications for Variation of Carriers' Licences.*

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles "A" Licences :—					
Published and dealt with at Inquiry ... ..	143	1,337	—	98	39
Published but determined without Inquiry ... ..			51	60	17
Not published ... ..			—	1,128	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	77	692	—	38	15
Published but determined without Inquiry ... ..			9	10	4
Not published ... ..			—	640	—
Variations of Special Conditions attached to "B" Licences...	4	79	11	44	21

11. The applications for variation of "A" or "B" Carriers' Licences not published in "Applications and Decisions" are composed of those submitted under Section 10, sub-section (2) of the Act of 1933 (substitution for a specified vehicle of a vehicle of the same or of a less weight unladen, etc.), which the Licensing Authority is bound to grant, and those applications for variations which, under Section 11, sub-section (3) (c) of the Act, were considered to be of a trivial character. It has been the practice to publish all applications, although apparently of a trivial character, which might give cause for objection. It follows, therefore, that no applications for variations "not published" were refused, since any application which appeared to be open to objection, whether trivial or otherwise, was advertised.

12. The applications "published but determined without Inquiry" were those without objection where the evidence of need furnished to the Licensing Authority by the applicant warranted the application being granted without the operator attending an Inquiry.

TABLE IV.—*Licences Current, Licence Holders, and Vehicles Authorised at 30th September, 1936, and 1935.*

Type of Licence.	At 30th September, 1936.			At 30th September, 1935.		
	Licences current.	Licence holders.	Vehicles authorised.	Licences current.	Licence holders.	Vehicles authorised.
"A" Public Carriers' Licences :—	No.	No.	No.	No.	No.	No.
Full Term ... ..	1,633	1,509	4,957	1,642	1,526	4,785
Contract ... ..	163	136	273	83	81	150
Short Term... ..	36	36	66	14	14	20
"B" Limited Carriers' Licences :—						
Full Term ... ..	1,973	1,951	2,978	2,054	2,040	3,065
Short Term... ..	15	15	18	4	4	4
"C" Private Carriers' Licences :—						
Full Term ... ..	10,286	10,286	17,821	8,999	8,999	15,824
Short Term... ..	14	14	13	35	35	46

*Public "A" Carriers' Licences.*

13. Whilst the numbers of Currency Period "A" Licences current, and the number of licence-holders have decreased slightly during the year, the net number of vehicles authorised has increased by 172; the increase is due to the substitution of articulated vehicles for rigid-type vehicles, the replacement of horses by motor vehicles, and the general improvement in trade. The number of vehicles licensed by the Railway Companies has increased from 467 to 551, but these additional vehicles have been principally for use in the Engineering Service Departments and not for traffic purposes. Excluding the railway-owned vehicles, the average number of vehicles authorised to each "A" Licence holder was 2.9 in 1936, as against 2.8 in 1935.

14. There has been a noticeable increase in the number of applications for Public "A" Carriers' Contract Licences; especially towards the close of the year. The Contract Licence is a useful feature of the Carriers' Licensing System but it is open to abuse. Although it is provided in the Act of 1933 that the contract must be for a continuous period of not less than one year, there is not sufficient safeguard against contracts being entered into by the owner of a vehicle and such contracts terminated by mutual consent if the work is completed in less than a year.

15. The Short Term Public "A" Carriers' Licences issued were granted mainly to operators engaged in the haulage of sugar beet during the season; the practice has been to advertise in "Applications and Decisions" the applications for these licences.

16. New applicants granted "A" Licences during the year for the first time were 55; this total included 31 Licences issued in respect of businesses acquired to which the provisions of Section 11 (3) (b) of the Act applied.

*Limited "B" Carriers' Licences.*

17. During the year the number of "B" Licences current decreased by 81 licences, and there were 87 less vehicles authorised.

18. The year was the first in which applications were received for the regrant of Limited "B" Carriers' Licences. Out of a total of 2,054 licences current at the 30th September, 1935, 1,929 applications were received for the regrant of licences; 125 holders of licences did not seek to continue as "B" Licensees. In some cases the persons discontinuing to hold "B" Licences gave reasons for doing so, and in general these were to the effect either that the vehicle had been disposed of or business given up; that the taxation rate for the vehicles had been changed to agricultural; or that hire or reward work had ceased. In one or two cases "A" Licences had been granted in lieu of "B" Licences.

19. The total number of applications for the regrant of "B" Licences (1,929) included 1,677 without modification of the number of vehicles or the special conditions. The applications with modification, 252 or 13 per cent., sought mainly to vary the special conditions, e.g., to increase the radius for general haulage; to carry additional commodities; or to provide transport for named persons not previously specified.

20. The number of new "B" Licences granted for the first time during the year was 111, including 24 licences issued in respect of businesses transferred under the provisions of Section 11 (3) (b) of the Act.

*Private "C" Carriers' Licences.*

21. It soon became apparent after the introduction of the Carriers' Licensing System in 1934 that some users of goods vehicles for or in connection with a trade or business carried on by them, which vehicles should be authorised on "C" Licences, were not conforming to the obligations placed upon them by the Act of 1933. The revised Regulations, coming into force on the 1st October, 1936, requiring all vehicles authorised on "C" Licences to carry vehicle Identity Certificates in the same manner as vehicles authorised on "A" or "B" Licences, will enable unauthorised "C" Vehicles to be more readily detected.



### *Maintenance of Goods Vehicles.*

22. The mechanical condition of the goods vehicles located in the Eastern Area has continued to improve, but there is, in the case of many owners, room for a higher standard of maintenance.

23. On four occasions in the month of September, 1936 (once during the day and three times at night) vehicles were, during a few hours, on different routes, stopped and examined. One hundred and ninety-six vehicles were inspected; of these vehicles 32 (or 16 per cent.) were in so dangerous a condition as to necessitate immediate prohibition, whilst 45 (or 23 per cent.) required delayed prohibitions on account of serious defects—in other words 77 vehicles (or 39 per cent.) were found so defective as to demand prohibition from use for the carriage of goods. In 23 of the cases mentioned above police court proceedings were instituted against the owners of the dangerous vehicles. In view of the number of vehicles found to be defective at these examinations arrangements have been made to hold similar inspections, but on a larger scale, during next year.

24. In all, about 8,390 examinations of goods vehicles were made by Vehicle Examiners in the Area. This number approximates more closely to the number of vehicles examined than last year, as the numbers of examinations per vehicle were less, owing to improved methods of maintenance by the better type of operators. During the year 1,367 Prohibition Notices were issued, composed of 556 immediate prohibitions and 811 delayed prohibitions: vehicles of 2½ tons unladen weight or less were the cause of 88 per cent. of the immediate prohibitions and 89 per cent. of the delayed prohibitions. In total during the year 1935-36, 88 per cent. of the Prohibition Notices were issued in respect of light vehicles, as compared with 69 per cent. in the previous year 1934-35. It should be borne in mind that, taking the country as a whole, light vehicles are over 85 per cent. of the total number of goods vehicles in use.

25. In order to show where the vehicles prohibited were defective, an analysis has been made of the defects noted on the Prohibition Notices issued during the year; the result of this analysis is given in the following table:—

*TABLE V.—Defective Vehicles—Defective Parts.*

Defective parts.	Number of defects.		Percentage applicable to vehicles of 2½ tons unladen weight, or under.
	No.	Percentage of total.	
		Per cent.	Per cent.
Steering ... ..	1,140	24	88
Springs ... ..	688	15	89
Brakes ... ..	1,062	22	90
Front axle... ..	258	5	92
Wheels ... ..	179	4	84
Frames ... ..	235	5	82
Rear axle ... ..	73	1	82
Engine ... ..	225	5	85
Exhaust ... ..	92	2	78
Petrol system ... ..	87	2	80
Bodywork ... ..	415	9	87
Water circuit ... ..	7	—	100
Other defects ... ..	266	6	88
Total ... ..	4,727	100	88

26. The importance of examining vehicles over inspection pits is becoming more recognised by owners of vehicles. It is estimated that during the year at least 75 per cent. of the examinations conducted by Vehicle Examiners were made over such pits.

### *Heavy Goods Vehicle Drivers' Licences.*

27. The number of persons residing in the Eastern Area holding licences to drive heavy goods vehicles at the 30th September, 1936, was 6,718.

28. Table No. VI gives the numbers of applications received during the year and shows how they were disposed of:—

TABLE VI.—*Heavy Goods Vehicles Drivers' Licences.*

<i>Applications.</i>	<i>No. of Applications.</i>
Outstanding at the 30th September, 1935	2,679
RECEIVED DURING THE YEAR:—	
New Applicants	2,064
Renewals	919
Total	5,662
DISPOSAL:—	
**	
Granted and Licences issued:—	
Claimed	2,516
Tested by Area Staff:—	
Heavy Goods Vehicle only	1,054
Dual Test	76
Tested by other Authorised Persons	331
Renewals	857
	4,834
Refused:—	
Under age	8
Fees not paid	46
Failed Test	41
Failed to undergo Test	116
	211
Withdrawn	342
Transferred to other Traffic Areas	15
Outstanding at 30th September, 1936	260

29. The total number of tests for Heavy Goods Vehicle Drivers' Licences or the variation of licences executed by Vehicle Examiners was 1,575. The number of applicants tested once was 1,189; tested twice 154; tested three times 22; and tested four times three—these figures do not include tests carried out by other authorised Examiners.

30. It is of interest to note that the average age of holders of Heavy Goods Vehicle Drivers' Licences (excluding licences to drive steam rollers) who applied for licences when the Licensing System commenced was about 35 years. New applicants now applying for licences are usually 21 years of age or slightly over that age.

31. No appeals were made to Courts of Summary Jurisdiction against decisions refusing the grant of Heavy Goods Vehicle Vocational Driving Licences.

#### *Wages and Conditions of Employment.*

32. One complaint was received from an organisation representative of persons engaged in the road transport industry complaining that a company holding "A" and "B" Carriers' Licences was unwilling to grant to their employees with over 12 months' service an annual holiday of one week with pay. The complaint was referred to the Chief Conciliation Officer, Ministry of Labour. The complainants subsequently withdrew their complaint, saying that it was not their intention to refer the matter to be dealt with under Section 93 of the Road Traffic Act, 1930, and Section 32 of the Road and Rail Traffic Act, 1933.

33. The absence of a scale of wages for employees of holders of "A" and "B" Carriers' Licences in the Eastern Traffic Area, recognised by employers and employed, is retarding the improvement of operating conditions in the road haulage industry in the Area, wages being an important factor in arriving at economic haulage rates.

#### *Enforcement.*

34. There has been further improvement during the year in the keeping of Daily Records of Hours of Work, Journeys and Loads by drivers of authorised goods vehicles, but nevertheless many drivers have failed to keep Records

and, in consequence, a large number of prosecutions have been instituted—often by Police Authorities. In a number of instances where Records were inspected there have been grave doubts as to the accuracy of the particulars recorded.

35. Many Licensees do not yet appreciate their obligations as employers to supervise the hours of work and conditions of employment of their drivers. Cases of excessive driving hours are still too frequent. Steps are being taken to assure the enforcement of the law.

36. The number of prosecutions concerning the operation of goods vehicles initiated either by the Licensing Authority or by the Police Authorities—where a member of the staff attached to the Traffic Area attended the proceedings—is shown in the following table:—

TABLE VII.—*Prosecutions.*

Offence.	1935-36.			1934-35.
	Convictions.	Dismissals.	Total.	Total.
<i>Licensing Offences.</i>				
Road and Rail Traffic Act, 1933; Goods Vehicles (Licences and Prohibitions) Regulations, 1936:—	No.	No.	No.	No.
Use of unlicensed vehicle ... ..	74	1	75	59
Use of authorised vehicle whilst under prohibition ... ..	17	1	18	9
Non-compliance with special conditions of "B" Licence ... ..	4	—	4	1
Failure to display Identity Certificate ...	12	—	12	3
Failure to return Licence and Identity Certificate ... ..	1	—	1	—
Use of Identity Certificate with intent to deceive ... ..	—	—	—	3
No identification lettering on "C" vehicles...	—	—	—	3
<i>Offences relating to Hours and Records.</i>				
Road Traffic Act, 1930 (Section 19); Road and Rail Traffic Act, 1933; Goods Vehicles (Keeping of Records) Regulations, 1935:—				
Excessive hours (driving for more than 11 hours) ... ..	42	—	42	54
Not having 10 consecutive hours for rest ...	67	—	67	14
Driving for more than 5½ hours without rest...	9	2	11	22
Failure to keep (or to carry) a current record	116	4	120	32
Failure to cause a current record to be kept...	73	3	76	20
Failure to produce a current record ... ..	4	—	4	—
Perjury Act, 1911:—				
False entry on driver's record ... ..	—	1	1	—
<i>Vocational Licence Offences.</i>				
Road Traffic Act, 1934 (Section 31):—				
Driving without a heavy goods vehicle driver's licence ... ..	50	—	50	—
Employing unlicensed heavy goods vehicle driver	31	1	32	—
<i>Offences under the Motor Vehicles (Construction and Use) Regulations, 1931.</i>				
Defective brakes ... ..	63	7	70	76
Defective tyres ... ..	18	—	18	19
General defective conditions ... ..	5	1	6	14
Overloading ... ..	7	—	7	2
Inefficient wings ... ..	4	—	4	—
	597	21	618	331

37. The Police Authorities have initiated a large number of prosecutions which are not included in the above table.

38. Three Public Inquiries were held, in accordance with the provisions of Section 13 of the Act of 1933, to consider whether the licences of the three licensees concerned should be suspended or revoked because of frequent breaches

of conditions of their licences. The licence of one operator was revoked; in another case the licence was suspended for approximately seven weeks; and the third licensee was placed on probation for six months.

*Appeals.*

39. No appeals were lodged during the year with the Road and Rail Traffic Appeal Tribunal under Section 15 of the Road and Rail Traffic Act, 1933, concerning decisions on applications for Carriers' Licences made in the Eastern Traffic Area.

*General.*

40. Complaints have been made by Highway Authorities and Police Authorities of the dangers arising to road users due to bricks falling on the highway from vehicles not fitted with adequate sideboards or without sideboards at all; prosecutions have been successfully undertaken by some of the Local Authorities where negligent loading caused the bricks to fall. Similar complaints have been made with regard to sugar beet falling on the highway from badly loaded vehicles. A suitable regulation prescribing that vehicles in which bricks and similar loose commodities are loaded must have adequate sideboards or other protection to prevent loads from falling off would minimise the danger of accidents to other road users from this source.

41. A noticeable feature of the year's Licensing has been the many instances in which operators have endeavoured to keep the unladen weight of vehicles acquired at 2½ tons or below that weight. Their reasons for doing so are obvious—increased maximum legal speed; drivers below the age of 21 can be employed; and Heavy Goods Vehicle Drivers' Licences are not necessary. The absence of a laden weight limitation permits these light vehicles to be overloaded and to become a danger to other road users.

42. Evidence tendered at Public Inquiries on occasions has indicated that since the Act of 1933 came into operation, and control of the Road Haulage Industry instituted, there has been a better stabilisation of haulage rates. The establishment of a system of economic rates to which operators will adhere is of paramount importance to the industry, for it is in endeavouring to "cut" rates that some hauliers are tempted to work their employees unduly long hours and to pay wages on a low scale. My attention has been called to a Committee of hauliers formed in one locality in the Area voluntarily to adopt a scale of haulage rates for the district; the formation of similar Committees in other districts in the Area would help towards the solution of this urgent problem.

43. The machinery of the Act of 1933 has worked smoothly considering that the year under review was only the second year the Act was in operation. The Road Haulage Industry in general has settled down to the changed conditions with commendable adaptability.

44. In conclusion I desire to record my appreciation of the assistance given by the Police Authorities in connection with the enforcement of the Act and Regulations, and to the British Sugar Beet Corporation and their Factory Managers for their co-operation in regard to the examination of vehicles on Factory premises.

I have the honour to be, Sir,

Your obedient Servant,

HAVILAND HILEY,

Licensing Authority.

## SOUTH WALES TRAFFIC AREA

To the Minister of Transport,

SIR,

I have the honour to submit to you in accordance with Sub-section 4 of Section 23 of the Road and Rail Traffic Act, 1933, my second Report in regard to the duties under Part I of the Act imposed upon me by Section 4 of the Act.

### *Period covered by the Report.*

1. This Report covers the period from the 1st October, 1935, to the 30th September, 1936. As my first report covered the period from the 1st of January, 1934, to 30th September, 1935, the figures set out in this Report are not comparable with the figures set out in my first report.

### *Particulars of Licences applied for.*

2. The following table shows the numbers of applications for Carriers' licences received during the period under review and the manner in which those applications were dealt with:—

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ...	—	273	12	195	10
Short Term, Section 3 (3) ...	—	11	—	11	—
Contract... ..	—	43	—	39	3
"B" Licences :—					
Currency Period ...	—	1,899	4	1,702	13
Short Term, Section 3 (3) ...	—	11	—	11	—
"C" Licences :—					
Currency Period ...	—	1,282	61	1,206	—
Short Term, Section 3 (3) ...	—	65	—	65	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... .. "A": - "B": - "C": 2

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... .. "A": - "B": -

Short Term Administrative Licences issued (Section 3 (4) ) ... .. "A": 4 "B": 3

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... "A": 9 "B": 3

*Variation of Carriers' Licences.*

3. The following table shows the numbers and the classes of applications for variations of licences received during the period under review, and the manner in which those applications were dealt with:—

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to vehicles "A" Licences:—					
Published and dealt with at Inquiry ... ..	..	524	5	51	26
Published but determined without Inquiry ... ..	—		1	18	—
Not Published ... ..			8	393	—
"B" Licences:—					
Published and dealt with at Inquiry ... ..		667	5	39	20
Published but determined without Inquiry ... ..	—		2	57	—
Not Published ... ..			5	513	—
Variations of Conditions attached to B Licences ...	—	158	10	103	33

*Applications under Section 2 (4) of the Road and Rail Traffic Act, 1933, for permission to use vehicles authorised under "C" licences for the carriage of goods for persons to whom the vehicles are let.*

4. The only applications received falling within the above category were a very small number in connection with the use of vehicles by the Postmaster-General for local deliveries of mails during the Christmas period.

*Revocation and Suspension of Licences.*

5. During the year under review I held one Public Inquiry for the purpose of investigating whether breaches of conditions attached to an "A" licence had been committed and if so what disciplinary action, if any, I should take. The particular allegations were that drivers had worked for periods in excess of those lawful under Section 19 of the Road Traffic Act, 1930, and that the provisions of Section 16 of the Road and Rail Traffic Act, 1933, relating to the keeping of records had not been complied with. After an Inquiry lasting a day I found that breaches of both those Sections had been committed and I decided to suspend the licence for a period of six weeks.

*Applications for new licences in substitution for existing "B" licences.*

6. During the year applications for new licences in substitution for practically all existing "B" licences were dealt with. In attaching conditions to "B" licences granted during the first licensing period I considered that as it was obvious that the public, particularly in the rural parts of the South Wales Traffic Area, were very largely dependent upon the services of carriers holding "B" licences it was important that I should not attach conditions to those licences which were unduly restrictive and which would in any way constitute anything like a substantial interference with the user of the authorised vehicles in the future in the same way as they had been used in the past. I was therefore careful not to attach any conditions which would constitute an undue interference with the operations of those vehicles. The result has been that the number of applications for variation of the conditions attached to "B" licences has been comparatively few and in practically all cases the holders of "B" licences have been prepared to accept the same conditions in respect of any additional vehicles applied for. Although during the earlier part of the period the railway companies lodged notices of objection in a large number of cases in which applications were made for new licences in substitution for existing licences without any variation of conditions, the attitude of the railway companies in this area was subsequently very considerably modified and it is only

in a small percentage of cases that notices of objection are now lodged in respect of such applications. It is generally found that some special circumstances which call for investigation exist in most of the cases in which notices of objection are now lodged in these cases.

*Applications for new licences in substitution for existing "A" licences.*

7. Having regard to the currency period of "A" licences a proportion only of that class of licence has expired during the period covered by this report and it is only in respect of a small proportion of the applications for new licences in those cases that notices of objection were lodged either by the railway companies or by road operators. The cases in which objections were lodged are all cases in which the carriers concerned are engaged on long distance haulage, no objections having been lodged against applications by carriers who confine their operations to the South Wales Area. A number of the opposed cases has been dealt with and new licences granted. The hearing of the remaining cases is, with the consent of all parties, being deferred pending the decisions of the Appeal Tribunal in certain cases which it is understood are to be heard shortly by the Tribunal.

*Public Inquiries for the purpose of hearing applications for "A" and "B" Licences and variations of such licences.*

8. Public Inquiries were held on a total of 69 days at the following places, namely:—

Cardiff	...	...	...	...	...	...	...	...	14
Newport	...	...	...	...	...	...	...	...	14
Swansea	...	...	...	...	...	...	...	...	12
Pontypridd	...	...	...	...	...	...	...	...	8
Bridgend	...	...	...	...	...	...	...	...	3
Carmarthen	...	...	...	...	...	...	...	...	11
Brecon	...	...	...	...	...	...	...	...	2
Llandrindod Wells	...	...	...	...	...	...	...	...	1
Haverfordwest	...	...	...	...	...	...	...	...	3
Aberayron	...	...	...	...	...	...	...	...	1
Total	...	...	...	...	...	...	...	...	69

Although most of the Inquiries were held in the populous areas of Glamorganshire and Monmouthshire it was also found necessary to hold periodical Inquiries at different places in the outlying districts in order to avoid the hardship and inconvenience which might have been caused if applicants had been required to attend and bring their witnesses to Public Inquiries held at some distance from their places of business. I hold the view very strongly that every application should be heard as near the applicant's home as is reasonably possible.

*Idle Vehicles.*

9. During the period under review, it has been found possible to examine the registration book of every vehicle in respect of which a new licence has been applied for in substitution for an existing licence and it has been somewhat surprising to find that many vehicles authorised under current licences have not been licensed under the Roads Act, 1920, for some time prior to the dates of the applications for new licences. When it has been found that a vehicle has not been licensed for some considerable time before the application for the new licence an explanation has been called for. Where a reasonable explanation has been forthcoming it has been accepted as it is obvious that there must always be a number of vehicles undergoing repair or which are rendered idle owing to temporary fluctuations in business or slackness of trade. Where in a distressed area like South Wales vehicles are rendered idle through slackness of trade, a wide latitude should in my opinion be allowed in the application of the provisions of sub-section 3 of Section 10 of the Act. Similarly in deciding whether vehicles which are temporarily off the road should be included in new licences I have always had to bear in mind the present conditions in my area. A number of cases, however, has been brought to light

where carriers have more or less abandoned their operations for reasons quite unconnected with fluctuation of their business or slackness of trade and in circumstances which have made it necessary for me to authorise other vehicles to carry out the work previously carried out by their vehicles. In those cases I have found it necessary to refuse to authorise the idle vehicles under the new licences when granted.

In similar circumstances I have also removed vehicles from licences under sub-section 3 of Section 10 of the Act but I have never removed any authorised vehicle from a licence or refused to authorise it under a new licence granted in substitution for an existing licence without giving the carrier an opportunity of explaining his position.

#### *Appeals under Section 15 of the Act.*

10. No appeals were lodged with the Appeal Tribunal against any of my decisions during the year.

#### *Enforcement.*

11. A number of additional Traffic Examiners was appointed for this area, primarily for the purpose of assisting in the enforcement of the provisions of the Road and Rail Traffic Act, 1933. These Examiners are now distributed over the whole of the area and as a result of their appointment it has been found possible to keep much closer observation of operations of goods vehicles in the area.

#### *Offences and Proceedings.*

12. It has been necessary during the year to undertake a large number of prosecutions in respect of various offences against the Act and Regulations. As Licensing Authority I instituted proceedings in 170 cases against 351 persons in respect of 2,134 offences. I also co-operated with the Police Authorities in prosecutions in a further 112 cases against 159 persons in respect of 261 offences in which police officers laid the informations after the cases had been submitted for my consideration. For the purpose of these figures a number of partners trading as a firm has been treated as one person and informations laid against each of such partners have been regarded as in respect of one offence. Convictions were secured in respect of 2,200 summonses issued, the fines and costs imposed totalling £1,342 18s. 11d. The offences referred to above comprised the following:—

Offence.	Proceedings initiated by	
	Licensing Authority.	Police.
(a) Using vehicles other than under licences in contravention of Section 1 of the Road and Rail Traffic Act, 1933 ... ..	106	58
(b) Failing to keep, to carry, and/or to cause to be kept records under the Goods Vehicles (Keeping of Records) Regulations, 1935 ... ..	559	81
(c) Driving and/or employing persons to drive for hours in excess of those lawful under Section 19 of the Road Traffic Act, 1930 ... ..	1,277	58
(d) Using vehicles whilst notices prohibiting their use were in force, in contravention of Section 17 of the Road and Rail Traffic Act, 1933 ... ..	15	—
(e) Failing to affix identity certificates to vehicles authorised under "A" or "B" licences, in contravention of the Goods Vehicles (Licences and Prohibitions) Regulations ... ..	15	7
(f) Breaches of conditions attached to licences, in contravention of Section 9 of the Road and Rail Traffic Act, 1933 ... ..	10	29
(g) Failing to preserve records in contravention of Section 16 (4) of the Road and Rail Traffic Act, 1933 ... ..	33	—
(h) Driving heavy goods vehicles when not licensed for the purpose and/or employing persons to drive such vehicles in contravention of Section 31 of the Road Traffic Act, 1934 ... ..	105	28
(i) Using vehicles in a dangerous condition in contravention of the Motor Vehicles (Construction and Use) Regulations, 1931 ... ..	14	—
	2,134	261



In addition to the proceedings instituted by me as Licensing Authority or by the police at my request, the police themselves also instituted proceedings, and notified the results to me, in 528 cases against 610 persons in respect of 756 offences, fines and costs totalling £926 os. 6d. having been imposed. The offences are summarised below:—

	<i>No. of convictions.</i>
(a) Using vehicles other than under licences in contravention of Section 1 of the Road and Rail Traffic Act, 1933 ... ..	11
(b) Failing to keep, to carry and/or to cause to be kept records under the Goods Vehicles (Keeping of Records) Regulations, 1935 ... ..	190
(c) Failing to affix identity certificates to vehicles authorised under "A" or "B" licences, in contravention of the Goods Vehicles (Licences and Prohibitions) Regulations ... ..	11
(d) Using vehicles in a dangerous condition in contravention of the Motor Vehicles (Construction and Use) Regulations, 1931 ... ..	59
(e) Dangerous driving, etc. ... ..	64
(f) Driving in excess of speed limits ... ..	206
(g) Policies of Insurance or Driving Licences not in force	80
(h) Miscellaneous offences ... ..	135
	<hr/> 756 <hr/>

*Prohibition of vehicles on account of mechanical defects.*

13. A Staff of Vehicle Examiners is attached to this Area, and these officers examine goods vehicles as well as public service vehicles. Sufficient time has now elapsed to enable me to form an opinion as to the effect of the supervision exercised by the Vehicle Examiners over the condition of goods vehicles and I am glad to be able to say that the effect has been precisely the same as that which occurred in connection with passenger vehicles. The result of periodical examinations of goods vehicles together with the encouragement given by the Vehicle Examiners to owners to attend to their vehicles and to maintain a higher standard of maintenance has been to improve enormously the general condition of goods vehicles operating in the area. A much higher standard is now aimed at by the owners and it is a very common occurrence for the owner of a goods vehicle to say that he prefers to acquire a new vehicle than to put up with a vehicle which has proved unsatisfactory and which is causing trouble.

*Maintenance of Vehicles.*

14. 7,651 inspections of vehicles were carried out, and the use of 1,354 vehicles for the carriage of goods was prohibited in view of defects in those vehicles. Thirty-nine of the notices of prohibition came into effect immediately on their being issued and the remaining 1,315 notices of prohibition were to take effect at the end of certain specified times after they had been issued if the defects had not in the meantime been remedied.

*Objections by Road Carriers.*

15. In my last report I drew attention to the fact that it was only in a very small proportion of cases that objections against applications for "A" and "B" licences were lodged by road carriers. That position remains substantially unaltered.

*Section 93 of the Road Traffic Act, 1930, as amended and applied by Section 32 of the Road and Rail Traffic Act, 1933.*

16. Representations to the effect that the employers were failing to comply with the provisions of the Acts relative to the wages and hours and conditions

of employment of persons employed by them were received in five cases and were referred to the Chief Conciliation Officer of the Ministry of Labour for the South Wales and South Western Area. In two cases the employers agreed to comply with the provisions of the Acts in future, in one case no progress was made as the body which made the representations failed to answer a request for further information and was understood to be unwilling that the source of the representations should become known to the employer in respect of whom they were made and the remaining two cases are still in the hands of the Chief Conciliation Officer. The smallness of the number of cases in which representations have been made however does not in my opinion indicate that the observance of the statutory provisions on the subject in the Area is satisfactory. I think that the position clearly is that bodies entitled to make representations on the subject have refrained from doing so pending the outcome of the consideration of the question of the regulation of wages and conditions of service in the Road Transport Industry by the Committee appointed early in August, 1936, for that purpose by the Minister of Labour and by you.

*General effect of the Road and Rail Traffic Act, 1933, upon the Road Transport Industry.*

17. The experience which I have gained of the operation of the Act since it came into force is now sufficient to enable me to express a view in general terms of the effect of its provisions upon those engaged in the industry. I have no hesitation in saying that the Act has clearly proved to be to the benefit of those carriers whose businesses are well organised, properly controlled, and run on business lines, and who charge proper rates which enable them to keep their vehicles in good condition, to pay their employees proper wages and to afford them good conditions of employment. To those carriers the control provided by the Act has already proved a protection against unrestricted and in many cases uneconomic competition and in that way it has also provided them with a degree of security for the future. There can however be no doubt that there are still many carriers whose general standard of business, both from the point of view of maintenance of their vehicles and the rates of wages paid to and the hours of work and working conditions of their employees, leaves much to be desired. The root of the evil is in my opinion the cutting of rates and judging from the experience gained in connection with the licensing of passenger services under the Road Traffic Act, 1930, there can only be one end to that evil and that is that within a comparatively short time these unsatisfactory carriers will eliminate themselves from the industry. During the past two years a number of those carriers against whom complaints of rate cutting were received and the condition of whose vehicles has left much to be desired and who have proved unsatisfactory in other respects have already failed to carry on their businesses and in that way disappeared from the industry. The pressure which has to be exerted on those carriers who persist, in spite of every advice given to them, in carrying at rates which are uneconomic to comply with the provisions of the Act and Regulations will eventually eliminate them and that, coupled with the care which is now exercised by all Licensing Authorities in admitting new entrants into the industry, is in my opinion bound in due course to reflect in favour of the good carrier who maintains a high standard in the conduct of his business. The process of improving conditions in the industry may be a slow one but I am satisfied that it is a sure one and in my opinion it is far better that the elimination from the industry of the unsatisfactory carriers should be carried out by a gradual process than that there should be anything in the nature of drastic action which might result in great injustice and unnecessary hardship. I have reason to believe that the general feeling in the South Wales Area is that the Act is proving to be to the definite advantage of those carriers whose ambition it is to carry on their operations on businesslike lines and with due regard to the performance of all their legal obligations.

*Objections against applications for new licences by newcomers into the industry, and for variations of licences by the authorisation of additional vehicles.*

18. Notice of objection is given by the Railway Companies against practically every application for a new "A" licence by a person who is not already the holder of an "A" licence and in respect of the majority of applications

for the authorisation of an additional vehicle under an existing "A" licence. This necessitates that these applications should be determined by me at a Public Inquiry. Even if no notice of objection were given in respect of these applications my experience in dealing with applications of this kind for the past two-and-a-half years has been such that in my opinion it is highly desirable in the interests of those already engaged in the road transport industry that the applications should generally be investigated by me at a Public Inquiry and should only be granted, even if there is no notice of objection, after I am satisfied that a need has been proved for the granting of the application. So many applications which, upon the face of them appear to be very simple and straightforward applications, have been found upon investigation to be nothing but attempts to circumvent previous decisions which I have given refusing to license vehicles, or to obtain vehicles to do work which is already being done by existing carriers by road or rail and in that way to extract traffic from existing carriers, that I am somewhat reluctantly driven to the conclusion that except in very rare instances the only satisfactory way of dealing with these applications is to investigate them myself at a Public Inquiry. Whilst the Railway Companies take the necessary steps by giving notices of objection to secure that the applications shall be duly investigated at a Public Inquiry I cannot say that their attitude at the Public Inquiries has been in any way unreasonable and in those cases in which an applicant has made out anything like a case they have not pressed their objections unduly but have consented to my using very wide discretion to act as I thought was fair and equitable without insisting upon too many technicalities.

With regard to applications for "B" licences, subject to a limited radius of operation for the carriage of goods for hire or reward, by applicants who are not already the holders of "B" licences, where the proposed radius does not exceed 15 miles the Railway Companies do not normally object and the cases in which objections are made by other carriers holding "A" or "B" licences are very few. In those cases where applicants for "B" licences ask for a radius of over 15 miles and up to 25 to 35 miles the Railway Companies generally object when the particular applicant's base is in a thickly populated part of the Area and there are extensive Railway facilities, but do not generally object when the applicant resides in a country district. Where a new applicant asks for a radius of over 35 miles notice of objection is usually lodged by the Railway Company which may be affected and often by road operators. Even however in connection with applications by new applicants for "B" licences subject to a very limited radius and which upon the face of them appear to be reasonable applications, cases have come to my knowledge where an applicant against whose application no notice of objection has been given and whose application has been granted has immediately made use of his vehicle on work carrying for other carriers for which I have after a full investigation at a Public Inquiry refused such other carriers additional vehicles. This shows that there are some carriers who are prepared to attempt any device to circumvent the decisions of the Licensing Authority and whilst the reliable and straightforward carrier may perhaps sometimes feel that he is being put to considerable trouble in connection with applications for authorising the use of additional vehicles, he may be assured that the great care which is being exercised by all the Licensing Authorities in considering applications for additional vehicles has from experience been proved to be absolutely necessary and that the steps which are being taken are bound in the end to react to the benefit of the applicant who has a straightforward and genuine case.

#### *Heavy Goods Vehicle Drivers' Licences.*

19. 1,348 applications for licences to drive heavy goods vehicles were received during the year making with 332 applications in hand on the 1st October, 1935, a total of 1,680 applications for consideration. Of this total 119 applications were withdrawn, six were refused and 1,533 licences were granted leaving 22 applications awaiting decision on the 30th September, 1936. No appeals were made to Courts of Summary Jurisdiction against my decisions on these applications.

Vehicle Examiners carried out 264 driving tests of applicants for licences to drive heavy goods vehicles who already held motor driving licences under

Part I of the Road Traffic Act, 1930. 226 applicants passed at first tests. Six applicants failed at first tests and in two of those cases the applications were then withdrawn. Three of the remaining applicants passed at subsequent tests and one applicant was refused a licence consequent on his failure to pass a test. Twenty-nine applicants who had failed at first tests during the period ended the 30th September, 1935, underwent further tests during the year ended the 30th September, 1936.

Vehicle Examiners carried out 22 driving tests of applicants for licences to drive heavy goods vehicles who were also applicants for motor driving licences under Part I of the Road Traffic Act, 1930, and in each case the applicant passed at first test.

Licences were granted to 121 persons who passed tests conducted by persons, other than Vehicle Examiners, authorised to conduct tests.

On the 30th September, 1936, 173 applicants awaited further tests as drivers of heavy goods vehicles, they having in the first instance been tested as drivers of other types of vehicles.

I have the honour to be, Sir,

Your obedient Servant,

A. T. JAMES,  
Licensing Authority.

## WESTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to submit my second report as Licensing Authority for the Western Traffic Area in accordance with the provisions of the Road and Rail Traffic Act, 1933.

The present report covers the year ended the 30th September, 1936.

2. The valuable educational work carried out by the associations of operators amongst their members, together with the publicity given by the press to the provisions of the Act and the proceedings at the Public Inquiries held by the Licensing Authority in all parts of the Area, helped very considerably to secure a better understanding of the legal requirements, with the result that, amongst other things, applications for licences and variations to licences were more accurately prepared, and there was a decided improvement in the presentation of cases at Public Inquiries, but in this respect there is still much to be desired when applicants are not represented by Solicitors.

3. Applications for the renewal of both "A" and "B" Licences were dealt with during the year, the majority being without modification. Where additional vehicles or any substantial variation of the conditions attached to "B" Licences were applied for, proof of need was required. In most of such cases objections were lodged and while the large majority came from the Railways an increasing number came from other operators through their associations, and it would seem that they are becoming more alive to the need of protecting their interests.

4. A real difficulty experienced by applicants is in securing the attendance at Public Inquiries of persons who are prepared to support applications on the grounds that existing facilities are insufficient or unsuitable. Many firms, instead of sending a representative to the Inquiry to give evidence, rely upon letters in general terms, which are of little help. It seems reasonable to expect that traders who are suffering any real inconvenience from lack of suitable carrying facilities would be prepared to give evidence to that effect, and when they do not do so the impression is created that their needs may not be such as their letters indicate.

5. The Goods Vehicles (Licences and Prohibitions) Regulations, 1936, came into operation providing that on and from the 1st October, 1936, identity certificates should be affixed to vehicles authorised under "C" Licences. Such certificates were issued to operators during the week ended 4th July, 1936, in order to allow ample time to obtain containers and affix them to the vehicles by the prescribed date. The issue of the certificates brought to light a large number of cases where "C" vehicles had been disposed of and new ones brought into use without the requisite variation of the licence. In consequence, 819 licence holders had to apply for a variation of their licences. It was also discovered that 406 licence holders had ceased to own vehicles but had failed to surrender their licences, and in 160 cases vehicles had been sold to and were being used by other traders who had failed to take out the necessary licences.

6. The requirement that vehicles authorised under "C" Licences should be brought into line with those under "A" and "B" Licences as regards identity certificates has been most helpful to the police and traffic examiners in enabling them to detect unauthorised vehicles; and has removed the need for the many inquiries which previously were necessary in order to verify through the area offices whether a vehicle was specified in a licence or not.

*Applications for Licences.*

7. The following tables show the number of applications received for the various types of licences and the manner of their disposal:—

**TABLE I.—Applications for Carriers' Licences.**

Nature of Application.	Applications outstanding from previous year. ..	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ... ..	10	869	24	560	25
Short Term, Section 3 (3) ...	—	6	4	1	—
Contract ... ..	1	148	3	140	2*
"B" Licences :—					
Currency Period ... ..	722	2,716	47	2,738	43
Short Term, Section 3 (3) ...	—	21	2	17	2
"C" Licences :—					
Currency Period ... ..	32	2,460	9	2,466	—
Short Term, Section 3 (3) ...	—	25	—	25	—

\* The documents submitted in support of these applications did not constitute a contract within the meaning of Section 7 (1) of the Act.

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... "A": 2 "B": Nil "C": 3

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... "A": 24 "B": 40

Short Term Administrative Licences issued (Section 3 (4)) ... "A": 260 "B": 625

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... "A": 7 "B": 3

**TABLE II.—Applications for variation of Carriers' Licences.**

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles					
"A" Licences :—					
Published and dealt with at Inquiry ... ..	31	1,178	5	130	25
Published but determined without Inquiry ... ..			27	15	—
Not published ... ..			31	946	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	6	1,125	2	91	19
Published but determined without Inquiry ... ..			14	58	—
Not published ... ..			4	902	—
Variations of Conditions attached to "B" Licences...	30	60	3	71	16

Of the applications shown as refused in Tables I and II, 18 and 16 respectively were refused for lack of prosecution.

8. In addition, 37 applications under Section 2 (4) of the Act were received for permission to use vehicles authorised under private carriers' "C" Licences for the carriage of goods of persons to whom they were hired. In 31 of these cases the vehicles were required for the carriage of post office mails at Christmas, and in the others for the carriage of special types of goods for which other licensed vehicles in the district were not suitable.

#### *Objections to Applications.*

9. Objections numbering 1,679 were received in respect of 755 applications, as under:—

	<i>Applications objected to.</i>	<i>No. of objections.</i>
"A" new licences or renewals ... ..	130	354
"A" variations to licences ... ..	146	493
"B" new licences or renewals ... ..	369	615
"B" variations to licences ... ..	110	217
	755	1,679

#### *Public Inquiries.*

10. During the period under review, 91 Public Inquiries were held at the following places:—

<i>Place.</i>	<i>No. of Days.</i>	<i>Place.</i>	<i>No. of Days.</i>
Barnstaple ... ..	1	Gloucester ... ..	11
Bideford ... ..	1	Plymouth ... ..	5
Bristol ... ..	36	Salisbury ... ..	4
Cheltenham ... ..	2	Taunton ... ..	7
Dorchester ... ..	6	Torquay ... ..	1
Exeter ... ..	9	Truro ... ..	8

#### *Appeals.*

11. Six appeals were lodged with the Appeal Tribunal, the nature of which and the results being as follows:—

<i>Nature.</i>	<i>No. of Appeals.</i>	<i>Allowed.</i>	<i>Dismissed.</i>	<i>Pending.</i>
Against refusal to grant licences or variations ... ..	3	—	2	1
Against grant of licences or variations ... ..	3*	—	2*	1
	6	—	4	2

\* 2 of these were appeals by two railway companies against the grant of a variation of one licence.

#### *Maintenance of Vehicles.*

12. Considerable progress has been made by the majority of the large operators in improving their maintenance facilities. In the urban districts, a better standard has been observed in the condition of the vehicles owned by a large proportion of the small operators, and although many of them must depend on local garages for vehicle maintenance, an effort is being made to work to a system, with reasonably good results; but there are still many whose vehicles leave much to be desired and some who require constant supervision. It is unlikely that the latter will ever prove really satisfactory.

Generally speaking, in the rural districts maintenance facilities are poor and little progress towards improvement has been made.

13. During the period covered by this Report the Vehicle Examiners carried out 10,196 inspections, the number of vehicles concerned being 7,209. 1,834 prohibition notices were issued, of which 386 came into force immediately. The number of defects specified in each prohibition notice averaged six and the defects over the whole may be classified as follows:—

	<i>Per cent.</i>
Steering units ... ..	21·3
Springs ... ..	14·9
Body and fittings ... ..	10·9
Power unit and primary transmission ... ..	10·1
Hand brake ... ..	8·3
Foot brake ... ..	8·1
Front axle ... ..	6·0
Wheels ... ..	5·75
Chassis frame and fittings ... ..	5·54
Various ... ..	5·15
Rear axle ... ..	3·96

14. No appeals to the Certifying Officer or the Minister against the refusal to remove a prohibition were made.

15. Reports relating to 32 accidents, in which goods vehicles were involved, were received from the police, and these were fully investigated so far as the vehicles were concerned.

#### *Enforcement.*

16. Two limited "B" carriers' licences held by one operator and in which five vehicles were specified were suspended with effect from the 28th November, 1935, owing to the failure of the licence holder to maintain the vehicles in a fit and serviceable condition. One of the licences was subsequently cancelled and the other amended so as to include one vehicle only.

During the year, 4,397 reports of offences were made by the traffic examiners and the police. Of these 76 per cent. were in respect of offences under the Goods Vehicles (Keeping of Records) Regulations, 10·8 per cent. related to excess driving hours and 7·7 per cent. to the use of vehicles not authorised under licences. Warnings were given in 3,363 cases and in the remainder proceedings were instituted or are still under consideration.

Of the total number of reports of offences, 3,337 were made by the traffic examiners and 1,060 by the police.

Of the offences prosecuted 1,193 were instituted by the Licensing Authority and 390 by the police.

There is a considerable difference in the treatment of offenders for similar offences by Magistrates in different parts of the Area and while many Benches show by the substantial penalties they inflict that they recognise the importance of securing compliance with the provisions of the Act, there are others in certain districts who impose such merely nominal fines that no deterrent effect from them could be expected.

Of the prosecutions instituted by the Licensing Authority, in 328 cases the fines ranged from 2s. 6d. to 5s.; in 18, from 1s. 6d. to 2s. 6d.; in 78, 1s. only; and 90 cases were dismissed (cases proved) under the Probation of Offenders' Act.

Offences are far too prevalent; and it may be overlooked that they are injurious to the interests of the law-abiding operators as well as against the public interest.

A Licensing Authority's responsibility is discharged in bringing offenders before the Magistrates and it is no concern of his as to how the cases are dealt with; but it would be regrettable if extreme leniency should create the impression in certain localities that offences could be committed with impunity.



The following table gives particulars of the cases in which police court proceedings were instituted during the year:—

(1) Nature of offences.	(2) Persons concerned.	(3) Total offences.	(4) Convicted or dealt with under Probation of Offenders Act.	(5) Dismissed.	(6) Pending.
Operators :—					
Using goods vehicles without licences ... ..	138	149	135	—	14
Using goods vehicles whilst under prohibition ... ..	22	29	29	—	—
Causing or permitting persons to drive excessive hours ... ..	37	331	288	4	39
Records—offences in connection with ... ..	173	254	207	10	37
Miscellaneous offences ... ..	44	70	62	4	4
Drivers :—					
Driving goods vehicles excess hours ... ..	72	175	162	5	8
Records—failing to keep or carry ... ..	547	567	512	31	24
Driving vehicles whilst under prohibition ... ..	1	8	8	—	—
Total ... ..	1,034	1,583	1,403	54	126

The 66 cases shown as pending in my previous report represented 154 offences, in respect of which convictions were secured in 135, the remainder being dismissed.

#### *Wages and Conditions of Employment.*

17. Many communications in which it was alleged that employers were not observing the provisions of Section 93 of the Road Traffic Act, 1930 (wages and conditions of employment of drivers) were forwarded by me to the Joint Conciliation Board for investigation, and in addition a number of such representations were made direct to the Board.

In 38 instances where the Board was unable to effect a settlement with the operators concerned, reports were submitted to me and passed to the Chief Conciliation Officer of the Ministry of Labour for this Area. The action taken by that officer in these cases together with nine others which were still in action at the date of the last report resulted in the operators undertaking to pay the agreed rate in 11 cases, in 10 cases the representations were withdrawn and the remaining 26 cases are still in action.

The question of wages, which is far from being settled, is closely related to the further important and very difficult question of stabilisation of rates. The operators' associations have made earnest efforts to secure agreement on both these matters but they are faced by almost insuperable obstacles.

In the circumstances which obtain at present, the best type of operator who pays the standard rate of wages, provides good conditions of employment and efficiently maintains his vehicles, suffers definite disadvantages in competition with others who do none of these things; amongst whom must be cited a large number of owner-drivers, and the farmer holding a "C" Licence who by the Act is permitted to carry agricultural products for neighbouring farmers, but who uses the privilege for purposes far beyond what was intended and so as seriously to compete with the "A" and "B" Licence holders.

With regard to owner-drivers, in this Area alone on the 30th April last, of the total number of "A" licence holders 58 per cent. of them owned one vehicle only and their licences covered 19 per cent. of the vehicles authorised. Of a total of 3,111 "B" licence holders 2,073 owned one vehicle only and their licences covered 45 per cent. of the vehicles authorised.

At Public Inquiries it has been shewn time after time that the reason for the transfer of traffic by a trader from one operator to another was purely a matter of rates, and while it is true that changes are made for other good reasons, the question of cost is usually a very important deciding factor. The result is that certain carriers who either have insufficient knowledge of operating costs or who are content to work on a bare subsistence level are willing to accept rates which are unremunerative, and thus the businesses of those working to reasonable standards are adversely affected.

*Licences to Drive Heavy Goods Vehicles.*

18. Applications outstanding on the 30th September, 1935, numbered 382, and during the period covered by the report 3,918 further applications were received for licences to drive heavy goods vehicles. Of these 387 were withdrawn, 3,699 granted, and 45 refused. The remainder were under consideration at the end of September.

The number of driving tests carried out by the vehicle examiners was 1,007. 776 applicants passed on the first test, 99 who failed then passed at a subsequent test, and 19 having failed in two tests were refused licences.

In addition, 256 driving tests were given by other persons authorised to carry out tests.

Prosecutions under Section 31 of the Road Traffic Act, 1934, for driving without licence, or employing drivers who were not licensed, numbered 48.

19. I desire to express my thanks to the police for their assistance and co-operation and to those local authorities who have kindly provided accommodation for the Public Inquiries.

I have the honour to be, Sir,

Your obedient Servant,

A. F. NICHOLSON,  
Licensing Authority.

## SOUTH-EASTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to submit my report as Licensing Authority for the South-Eastern Traffic Area in pursuance of the provisions of sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933, for the twelve months ended 30th September, 1936.

2. Colonel R. T. G. Tangye, O.B.E., B.A., LL.B., has continued to act as my deputy during the year under review, in dealing with applications for carriers' "A" and "B" licences under the Act, and with applications for the variation of licences in these categories. His assistance has been of great value and has enabled me to keep abreast of the large volume of work arising during these early stages of the operation of the Act, out of applications for the grant of new licences in substitution for "A" and "B" licences that have expired or are about to expire, and for variations to existing licences.

3. Public Inquiries for the hearing of these applications to the number of 111 have been held during the year at various centres in the Area. Sixty-six of these Inquiries were taken by myself and forty-five by Colonel Tangye.

The places at which Public Inquiries have been held are as follows:—

Bournemouth	...	...	...	...	...	...	...	7
Brighton	...	...	...	...	...	...	...	18
Canterbury	...	...	...	...	...	...	...	9
Chatham	...	...	...	...	...	...	...	1
Chichester	...	...	...	...	...	...	...	6
Havant	...	...	...	...	...	...	...	1
Lewes	...	...	...	...	...	...	...	8
London	...	...	...	...	...	...	...	15
Maidstone	...	...	...	...	...	...	...	13
Reading	...	...	...	...	...	...	...	13
Ryde (Isle of Wight)	...	...	...	...	...	...	...	1
Southampton	...	...	...	...	...	...	...	9
Winchester	...	...	...	...	...	...	...	10
							Total	111

4. The tables which follow (Table I and Table II) give in summary form the number of applications of various kinds which have been received during the year from operators in the South-Eastern Traffic Area, and show the manner in which they have been disposed of:—

TABLE I. *Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.			
			Withdrawn.	Granted.	Refused.	Out-standing.
"A" Licences :—						
Currency Period ... ..	5	294	37	196	36	30
Short Term, Section 3 (3)...	—	16	—	16	—	—
Contract ... ..	—	125	—	120	5	—
"B" Licences :—						
Currency Period ... ..	250	3,307	92	3,331	84	50
Short Term, Section 3 (3)	—	15	—	14	1	—
"C" Licences :—						
Currency Period ... ..	—	2,813	—	2,624	—	189
Short Term, Section 3 (3)	—	49	—	49	—	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... "A": 4 "B": 1 "C": 10

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied (i.e., on the taking over of the business of another carrier) and which were dealt with without publication ... .. "A": 5 "B": —

Short Term Administrative Licences issued (Section 3 (4)) ... "A": 24 "B": 143

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2), and Regulation 15 of the Licences and Prohibitions Regulations) ... .. "A": 22 "B": 10

TABLE II. *Applications for variation of Carriers' Licences.*

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.			
			Withdrawn.	Granted.	Refused.	Out-standing.
Variations relating to Vehicles						
"A" Licences :—						
Published and dealt with at Inquiry ... ..	10	997	—	89	28	—
Published but determined without Inquiry ... ..			31	23	—	10
Not published ... ..			—	826	—	—
"B" Licences :—						
Published and dealt with at Inquiry ... ..	20	1,148	—	141	26	—
Published but determined without Inquiry ... ..			34	25	—	20
Not published ... ..			—	922	—	—
Variations of Conditions attached to "B" Licences	4	54	5	38	12	3

5. The figures given in this paragraph show the position in the South-Eastern Traffic Area at 30th April, 1936.

TABLE III.

Number of licences of each class, number of vehicles authorised thereunder, and average number of vehicles per licence in the South-Eastern Traffic Area at 30th April, 1936.

	" A " licences (including short term).	" A " Contract licences.	" B " licences (including short term).	" C " licences (including short term).	All licences.
No. of licences ... ..	1,422	161	3,148	12,871	17,602
No. of vehicles authorised—					
(1) Motor vehicles in possession	4,459	425	5,657	24,759	35,300
(2) Motor vehicles to be hired	71	—	35	389	495
(3) trailers ... ..	522	22	338	586	1,468
(4) trade plates ... ..	—	—	—	239	239
Average No. of Motor vehicles in possession per licence ...	3.14	2.64	1.80	1.92	2.01

Of the holders of " A " licences, 793 were the owners of one vehicle only and 220 of two vehicles only. Similarly, in the " B " class, no fewer than 1,891 licensees were owners of one vehicle only, and 432 were owners of two vehicles only.

The number of persons holding licences of more than one class were:—

Holders of " A " and " B " licences ... ..	83
Holders of " A " and " C " licences ... ..	26
Holders of " B " and " C " licences ... ..	326
Holders of " A ", " B " and " C " licences ... ..	18
<b>Total ... ..</b>	<b>453</b>

6. Twelve emergency applications were granted during the year, under the provisions of Section 2 (4) of the Act, for permission to use vehicles under a " C " licence for carrying the goods of persons to whom the vehicles were temporarily hired. All these applications were in connection with the carrying of mails at Christmas time for the General Post Office. The Postmasters chiefly concerned have recently been asked to make arrangements for the work to be done in future, so far as possible, by holders of " A " or " B " licences.

7. Administrative short term licences, under the provisions of Section 3 (4) of the Act, have been issued in cases:

(1) where a business had been sold and the transaction completed before the new owner's application for a carrier's licence could be dealt with at a Public Inquiry;

(2) where a variation, by the substitution of vehicles of similar unladen weight and type, had been asked for after the expiry of the licence but before the application for a new licence could be decided;

(3) where there was sufficient justification for regularising illegal operation by an applicant pending the hearing of his application; and

(4) where unavoidable delay had arisen in dealing with an application for a new licence in substitution for one that had expired.

In each case it was made clear that the grant of the administrative short term licence was entirely without prejudice to any decision the Licensing Authority might reach on consideration of the substantive application.

8. The number of objections considered at Public Inquiries during the year have been as follows:—

" A " licences: objections to applications for the grant or the variation of a licence ... ..	277
" B " licences: objections to applications for the grant or the variation of a licence ... ..	1,355

In addition a number of objections were lodged but not pursued, either because the application itself was withdrawn, or because the objector (in most cases a railway company) and the applicant had come to terms.

I have been at some pains to impress upon applicants that the mere absence of any objection affords no justification for the grant of an application for a licence, or for the variation of a licence. The evidence submitted by objectors and the representations made on their behalf often serve to bring to light facts and arguments that would not otherwise come to the knowledge or the notice of the Licensing Authority. But it is for the Licensing Authority to be satisfied that the application should be granted in the "interests of the public generally", and the absence of specific objection is of no avail if adequate evidence of public need is lacking.

During the first year of the operation of the Act, the vast majority of the objections lodged was on behalf of one or the other of the railway companies—the Southern Railway for the greater part of the Area and the Great Western Railway for the district surrounding Reading. Latterly applications for variations or extensions of licences, whether during their currency or on expiry, have produced a rather higher proportion of objections on the part of other road operators. This has tended to lengthen the time required for the hearing of individual cases. The submission of a greater volume of direct oral evidence, both by applicants and by objectors, has also tended to lengthen proceedings. As the industry settles down under the licensing system established by the Act of 1933 the number of applications to be dealt with at Public Inquiries will no doubt be reduced but each application is likely to take a good deal longer than was the case in the earlier days of administration.

#### *Appeals.*

9. Six appeals to the Appeal Tribunal were outstanding on 30th September, 1935. These have since been decided as follows:—

Four appeals by objectors against the grant of "A" licences were allowed—two wholly, and two in part, i.e., by the deletion from the licence of one or more vehicles. One appeal by an applicant against the refusal to grant an "A" licence was dismissed, and one appeal by an applicant against the conditions attached to a "B" licence was allowed for a re-hearing.

During the year under review 12 appeals have been lodged with the Tribunal (in one case by three objectors to the same application).

Four appeals by objectors to the grant of "B" licences (including the three just referred to) have been allowed, and Orders have been made by the Tribunal modifying the conditions attached to the licence by the Licensing Authority. One appeal by an applicant against the refusal to vary a "B" licence has been dismissed. One appeal was abandoned and another allowed by consent of the parties.

The remaining five appeals were outstanding at the 30th September, 1936.

There have been no appeals to Courts of Summary Jurisdiction under Section 31 (8) of the Road Traffic Act, 1934, against the refusal to grant a licence to drive a heavy goods vehicle or the suspension or revocation of such a licence.

#### *Maintenance of goods vehicles:*

10. During the course of the year 12,525 vehicles have been inspected by the Examiners. "Prohibitions" have been issued in respect of 1,551 vehicles: 1,164 of these were delayed prohibitions and in most cases the defects were remedied in a few days to the satisfaction of the Examiner. The number of immediate prohibitions was 387.

11. It has been impressed upon Examiners that the use of vehicles should be prohibited only when defects are dangerous or are likely to become dangerous in the course of a little further service. Details of defects in braking and steering gear appear in the great majority of prohibition orders, and derangement in one or other of these two assemblies is the principal cause of prohibition.

Brakes are usually found to be ineffective or inefficient through neglect or maladjustment, but there have been instances, in the case of older vehicles, of indifferent design and unsuitable materials which render it difficult if not impossible to maintain the brakes in a safe state for reasonable periods.

On the other hand defects in steering gears are invariably due to lack of adjustment, lack of lubrication or general abuse. Defective body-work, broken springs, and loose and damaged mud-guards have been causes for the issue of many prohibition orders.

12. During the past year the condition of goods vehicles has undoubtedly improved, although it has not been possible up to the present to inspect more than one-third of the vehicles garaged in the Area.

*Licences to drive heavy goods vehicles.*

13. The position, as at 30th September, 1936, with regard to the issue of licences to drive heavy goods vehicles was as follows:—

Applications outstanding at 1st October, 1935	...	...	2,709
Applications received during the year ended 30th September, 1936	...	...	3,531
<b>Total</b>	...	...	<b>6,240</b>
Number of licences issued	...	...	5,686
Applications refused	...	...	487
Applications withdrawn	...	...	23
Applications still in action	...	...	44
<b>Total</b>	...	...	<b>6,240</b>

The number of licences issued up to 30th September, 1935, was 3,868. With the figure 5,686 given above for the year under review the total number of licences issued up to 30th September, 1936, is 9,554.

The great majority of the applicants could still claim exemption from a test on the ground that they had been in the habit of driving a heavy goods vehicle prior to 1st April, 1934. The number of applicants tested by Examiners during the year was 654: of these 631 were successful and 23 failed. The number of applicants tested and passed by other persons authorised to carry out tests was 209.

*Fair wages and conditions of employment.*

14. As was explained in my last Report, the South-Eastern Area Joint Conciliation Board extended the period of operation of its interim agreement (dated 16th January, 1935) from 1st July, 1935, to 31st December, 1935. During this extension it had been hoped that the Area Board would be able to arrive at an agreement as to the "final grading" of the districts in the Area, as regards the standard wages payable by road operators. Its failure to do so was reported to the National Joint Conciliation Board, and on 7th November, 1935, each side of the Area Board appeared before the Appeals Committee of the National Board and stated its case. I am informed that the employers' side of the Area Board was permitted to state its case after it had informed the Committee that no undertaking could be given that any award that the Committee might make would be accepted by the employers' side.

15. The National Board issued on 20th December, 1935, the Report, Decisions and Award of its Appeals Committee on the "final grading" of the South-Eastern Traffic Area. For purposes of record this Award is set out below.

*South-Eastern Area.*

(a) That the Boroughs of Southampton and Portsmouth shall be Grade 1, the actual radius or area that these towns shall cover, and which shall be included in Grade 1, to be determined by the South-Eastern Area Board.

(b) That Poole, Parkstone, Bournemouth and Reading shall be Grade 2, the actual radius or area that these towns shall cover, and which shall be included in Grade 2, to be determined by the South-Eastern Area Board.

(c) (i) The Employers stressed that throughout the South-Eastern Area there should, as far as possible, be one Grade in operation on the ground of the considerable inter-running and the consequent difficulties of administration. Therefore, the area East of the Chichester-Haslemere-London Road, including all the Coast Towns, the towns bordering on the Metropolitan Licensing Authority's Area, and towns such as those in the Medway Area, shall be Grade 2.

(ii) The South-Eastern Area Board shall have power to determine whether any part of the foregoing area, outside of the towns specified, shall be permitted to operate under Grade 3 on the ground of its rural character, and in the event of any part of the area being so allocated the Area Board shall also define such area.

(d) That the area West of the Chichester-Haslemere-London Road, with the foregoing exception, shall be Grade 3.

16. There has been no meeting of the South-Eastern Area Board since the award was made known, and in effect, since 31st December, 1935, there has been no Joint Conciliation Board Agreement in force in the Area. Any further steps in the direction of reaching an Agreement must await the report of the Committee recently set up by you and the Minister of Labour, under the chairmanship of Sir James Baillie, to consider "the regulation of wages and the conditions of service in the Road Transport Industry (Goods)".

17. The failure of the Area Joint Conciliation Board to reach agreement as to the grading of districts has prolonged the period of difficulty and uncertainty in the enforcement of the requirement as to fair wages and conditions of employment in respect of the use of vehicles under "A" and "B" licences. Until some generally accepted standard of fair wages and conditions of employment for workers in the industry of transport of goods by road can be secured the very elements of fair competition between operator and operator, or between road and rail, are lacking.

During the past year the machinery laid down in the Act for securing, in individual cases, the payment of "fair wages", has been set in motion against five operators in my Area—in each case at the instance of the Transport and General Workers' Union. The last case of the five is still in the hands of the Conciliation Officer of the Ministry of Labour. The other four cases have all been settled, on the intervention of the Conciliation Officer, by the operator giving an undertaking that standard wages would be paid—presumably on the basis of the interim agreement arrived at in 1935 by the Area Joint Conciliation Board. No case has been referred to the Industrial Court.

#### *Enforcement.*

18. I have found it necessary during the course of the year to take proceedings against 51 persons for various offences in connection with the use of goods vehicles. 619 summonses were issued, on which 574 convictions were secured, 45 summonses being dismissed, withdrawn or otherwise disposed of. In the same period chief officers of police are known to have taken proceedings against 303 persons, issuing 452 summonses on which 394 convictions were secured, the remaining 58 summonses being dismissed, withdrawn or otherwise disposed of.

The more common offences are set out below, with the number of cases in which the offence arose.

	<i>Cases.</i>
Use of unlicensed vehicle ... ..	124
Failure to keep proper records, etc. ... ..	140
Falsification of records ... ..	1
Excessive hours of driving, etc. (Sec. 19 of the Act of 1930) ... ..	32
Use of vehicle while under prohibition ... ..	16
Contravention of a condition attached to a licence ...	8

Many apparent offences are dealt with by warnings, given either by letter, or at a Public Inquiry, or by a personal visit on the part of an Examiner. Only the more serious offences are dealt with by way of prosecution.



19. In one particularly bad case a retail trader, holding a "C" licence, was convicted on 233 counts for causing or permitting his drivers to work excessive hours, and was fined £3 with half-a-guinea costs on each count, making a total of £821 6s. 6d.

20. I pointed out in my last Report that certain classes of operators under "C" licences, such as retail distributors and shopkeepers, or the owners of businesses where the driver acts as roundsman or salesman, etc., are among the worst offenders in the matter of causing or permitting excessive hours of driving. During the past five years the provisions of Section 19 of the Road Traffic Act, 1930, in this respect have been very widely ignored. It is my hope that the publicity that has been given in the local press to some of the proceedings before the magistrates will serve as a warning, and will relieve me of the distasteful duty of prosecuting so large a number of offenders.

21. In 19 cases I have had occasion to summon an operator to a Public Inquiry to show cause why his licence should not be suspended or revoked.

These have been cases where a warning had been given as to excessive hours of driving following an examination of the drivers' records, and where renewed offences had led to prosecution and conviction.

In two cases I found it necessary to suspend the licence for a fortnight and in two other cases for a week. In a fifth case four of the vehicles specified on the licence were suspended for a fortnight. Two of the offenders were holders of "B" licences and the three others were holders of "C" licences.

The sentences of suspension have intentionally been lenient. But as the licensing system becomes more fully established and its provisions better known, cases of persistent contravention of the provisions of the Act will need to be more severely dealt with.

22. Limitations as to the hours of driving, or of work, with a goods vehicle, and requirements as to periods of rest, were first laid down in Section 19 of the Road Traffic Act, 1930. The intention of Parliament is expressed in the preamble to the section itself—"with a view to protecting the public against the risks which arise in cases where the drivers of motor vehicles are suffering from excessive fatigue". But apart from considerations of public safety or of ordinary humanity, fair wages and reasonable conditions of employment are necessary to provide the main foundation of fair competition between operator and operator, or between one form of transport and another. When these can be secured the road transport industry will be in a healthier condition and equipped to offer even greater services to the public.

#### *General.*

23. During the past year the first licensing period for "B" licences has expired. Applications for renewal have afforded an opportunity for revising the conditions attached to those licences, in the light of the actual operations of the holders during the preceding twelve months and of the experience gained in the administration of the Act. It has been possible to straighten out certain anomalies and inconsistencies, which unavoidably crept in during the early days, when Licensing Authorities, applicants and objectors alike were feeling their way towards a rational application of an entirely new system of regulation and control.

Many applications for a modification of the conditions attached to a "B" licence, so as to enable the holder to operate further afield in carrying goods for hire or reward, were prompted by the fact that on occasion an opportunity had presented itself to carry goods for a customer to a destination beyond the limits imposed by the licence. Quite apart from the wider aspects of public interest and the claims of operators who are public carriers and nothing else, it is doubtful whether it is really in the interests of the local operator himself, when he has a local business of his own, to be allowed to take on an occasional job of long distance haulage. He may well forfeit thereby work in his immediate neighbourhood to an amount that could not be offset by the possible gain from an occasional excursion into unknown territory.

24. In addition to the holders of "B" licences a large number of holders of "A" licences have come under review to whom "administrative" short term licences had been granted, or full period licences from 1st October, 1934. A high proportion of these "A" licences had been issued in the first place on the basis of "claimable" tonnage, without bringing the holder to a Public Inquiry. On applications for renewal I am taking steps to bring every "A" licence holder to an Inquiry in order to ascertain the nature of the work which he is actually doing as a public carrier. As I anticipated when submitting my last Report, I have found that quite a number of these "A" licence holders were not entitled to "A" licences at all and should be operating under "B" licences. Though the bulk of their work may be general haulage I have discovered on inquiry that in many cases they also carry on a small business, such as dealing in sand, gravel, rubble, building materials or scrap iron, selling agricultural produce on commission, or some other casual form of trading. In such cases the application has been re-advertised as an application for a "B" licence, with suitable conditions in respect of the carrying of goods for hire or reward.

By the end of the next licensing year I hope to have brought all holders of "A" licences to a Public Inquiry, and so to have completed the first review of the facilities for the transport of goods by road in my Area.

25. In conclusion, I wish again to express my indebtedness to the staff attached to my office. Without their vigilant and loyal assistance the effective operation of the licensing system established by the Act of 1933 would have been impossible.

I have the honour to be,

Sir,

Your obedient Servant,

HENRY H. PIGGOTT,  
Licensing Authority.

## METROPOLITAN TRAFFIC AREA

To The Minister of Transport.

SIR,

I have the honour to present my Report for the period ending 30th September, 1936, as Licensing Authority for the Metropolitan Area, in accordance with Section 23 of the Road and Rail Traffic Act, 1933.

My previous Report covered the period from 1st January, 1934, to 30th September, 1935, and in that Report I explained the procedure under which applications for all classes of licences for the first currency period under the Act were dealt with. It will be remembered that 1st July, 1934, was the material date as from which every private carrier (with certain exceptions) who desired to use a goods vehicle on a road for the carriage of goods for or in connection with any business carried on by him (but not for hire or reward) must be the holder of a "C" licence. The corresponding date for (Public Carriers') "A" licences to authorise the use of goods vehicles for the carriage of goods for hire or reward, and for (Limited Carriers') "B" licences to authorise the use of goods vehicles for both the carriage of goods for or in connection with any business carried on by the user, and the carriage of goods for hire or reward was 1st October, 1934. Licences had, prior to the commencement of the period covered by this Report been granted in respect of substantially all applications then received, but in the case of about 500 "A" or "B" applications the short term administrative licences, which had been issued for the purpose of ensuring an even spread-over of expiry and renewal dates throughout the year, had not then expired and the full currency period licences in respect thereof remained to be issued. Applications for new licences of all classes continued to be received in considerable numbers, and it was evident from the number of vehicles which were still found to be operating without any carrier's licence, that many owners of vehicles had either not heard of the requirements of the law, or had neglected to apply for licences, notwithstanding the wide publicity which had been given to the provisions of the Act. Although vehicles authorised by "A" and "B" licences were required to display identity certificates, the holders of "C" licences had been allowed the option of painting either the "C" licence number or the name of the user on the vehicle. It was therefore not readily noticeable whether a vehicle seen in use was duly licensed or not. On 26th March, 1936, the regulations were amended to make the display of identity certificates compulsory as from 1st October, 1936, for all licensed goods vehicles, whatever their class. This was done partly to obviate the difficulties described, and partly because experience had shown that it was on the whole easier for the users of vehicles to comply with a requirement to display identity certificates supplied to all licence holders, than to adopt the alternative of painting the names of the licence holders or the numbers of the licences on authorised vehicles. In consequence of the new regulation many more users of vehicles became aware of the licensing requirements, or were induced to apply for licences. It was also thereby disclosed that several thousand sales or substitutions of vehicles specified in "C" licences, and many changes in the constitution of licence holding firms had been effected without proper notification to the Licensing Authority, or application to amend the licences.

During the year ending 30th September, 1936, applications were received for 2,555 Public Carriers' "A" licences, 5,400 Limited Carriers' "B" licences and 7,584 Private Carriers' "C" licences. There were also 3,653 applications for variation of "A" licences, 1,934 applications for variation of "B" licences and 12,626 applications for variation of "C" licences. It will be appreciated that "B" licences have a currency period of only one year, and therefore, during the year under review all "B" licences, except those which were granted as new licences during the year, expired, and applications for renewal of these licences are included in the total figure of "B" licence applications. In the case of "A" licences, however, the full currency licence period is two years, and therefore only 1,261 "A" licences expired. The date of expiry of these 1,261 "A" licences was 30th September, 1936, and in order to complete the spread-over of expiry and renewal dates of "A" licences for future years, 826 short term administrative licences were issued instead of full term licences. This procedure, and the fact that applications for renewal of "A" and "B"

licences should be made two months before the date of expiry, explains why a number of applications are recorded as not having been dealt with at 30th September, 1936. The consideration of applications and the issue of licences are actually well up to date. Particulars of all the above applications for licences and for variation of licences are contained in the following tables showing the disposal of the applications:—

TABLE I.—*Applications for Carrier's Licences.*

Nature of application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.				Applications outstanding.
			Withdrawn.	Granted.	Refused.	Dismissed for lack of prosecution	
"A" Licences :—							
Currency Period ...	49	1,550	88	529	71	43	868
Short Term, Section 3 (3)	4	89	—	86	1	—	6
Contract ...	5	916	20	801	—	—	100
"B" Licences :—							
Currency Period ...	594*	5,367	138	4,922	165	116	620
Short Term, Section 3 (3)	1	33	3	28	—	—	3
"C" Licences :—							
Currency Period ...	—	7,165	122	6,885	—	—	158
Short Term, Section 3 (3)	—	419	—	419	—	—	—

Applications (included above) in respect of which a holding Company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... .. "A": 2 "B": Nil "C": 25

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... .. "A": 31 "B": 34

Short Term Administrative Licences issued (Section 3 (4)) ... .. "A": 864 "B": 661

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... .. "A": 71 "B": 11

\* Amended figure: includes 476 cases where for purposes of spread-over Short Term Administrative Licences were issued prior to the issue of Full Term Currency Licences.

TABLE II.—*Applications for variation of Carriers' Licences.*

Nature of variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.				Applications outstanding.
			Withdrawn.	Granted.	Refused.	Dismissed for lack of prosecution.	
Variations relating to Vehicles.							
"A" Licences :—							
Published and dealt with at Inquiry ...	144	3,318	51	306	113	11	136
Published but determined without Inquiry ...			53	311	—	—	
Not published ...			—	2,481	—	—	
"A" Contract licences ...	—	335	—	335	—	—	
"B" Licences :—							
Published and dealt with at Inquiry ...	70	1,755	33	213	54	12	95
Published but determined without Inquiry ...			20	147	—	—	
Not published ...			—	1,251	—	—	
Variations of Conditions attached to "B" Licences	14	179	21	107	39	10	16
"C" Licences (Variations)	—	12,626	296	11,608	—	—	722

### Objections.

It is of interest to observe to what extent applications for grant and renewal of licences and for variation of licences have been opposed by those entitled to lodge formal objection under the Act. During the period of my previous Report a large proportion of applications were for claimed tonnage in respect of which no objection could be lodged. Many of the applications received during the period covered by this Report were also of a character such that no objection could be made, e.g., applications for replacement of vehicles by vehicles of unladen weight not exceeding the unladen weight of the vehicles replaced, or applications which could be regarded as trivial. In order to get a true picture of the percentage of applications which are in practice objected to it has been necessary to have regard to all applications including those which were not liable to objection, and those which were treated as trivial. On this basis the percentages are as follows:—

Application for.	Percentage of applications in which objections were lodged and pursued.	
	"A" applications.	"B" applications.
New licence ... ..	74	65
Renewal of licence ... ..	8	14
Variation of licence :—		
Vehicles ... ..	14	11
Conditions ... ..	—	70

It is evident, therefore, that apart from new applications, only a small percentage of applications for renewal or variation by substitution or addition of vehicles are opposed. In the case of variations by addition or substitution of vehicles, the percentage would of course be greatly increased if variations which were not legally liable to objection and trivial variations were excluded, but the table on the basis adopted gives a more correct picture of the extent to which licensees are called upon to meet objections in the operation of the licensing procedure. The figure of 8 per cent. in the case of renewal of "A" licences and 14 per cent. in the case of renewal of "B" licences includes of course all applications for renewal where additional or larger vehicles are applied for at the time of renewal.

### Public Inquiries.

During the period under review a total of 186 Public Inquiries on 189 days have been held by me and by the Deputy Licensing Authority, Colonel R. T. G. Tangye, O.B.E., LL.B., B.A. In my last Report I explained that in cases where applications for licences or variation of licences were not trivial, and were not of such a nature that they could be granted without any fuller evidence than might be disclosed by the particulars supplied with the application, or where conditions of "B" licences could not easily be settled by correspondence, I had found it desirable in the interest of applicants themselves to give them the opportunity to state their requirements, and to explain fully the grounds of their applications at Public Inquiries. I fully appreciate that to attend an Inquiry occupies valuable time, but there is no doubt that the procedure of Public Inquiry is the most satisfactory procedure for investigating evidence, and for enabling applicants to make clear their requirements and explain their difficulties. Where such procedure is adopted, all interested persons can satisfy themselves as to how the Act is being administered. It is therefore sometimes considered desirable, whether notice of objection has been received or not, to set applications down for public inquiry. This is not usually necessary, however, in the case of renewal applications without modification, and such applications are determined without public inquiry, except in special cases where notice of objection may for some reason have been given, or where some particular question arises, such as the necessity to reconsider the conditions of a "B" licence. A number of "B" licences were originally granted with exceptional conditions to meet special circumstances existing at the time, or with conditions which were wider than applicants required, but were so framed until the applicants should be in a position to produce records to show their requirements.

In certain cases of this kind the applications for renewal have had to be heard at Public Inquiry. Moreover, in many cases, licensees have applied for vehicles which had ceased to be used under licences, to be included in their renewed licences. Public Inquiries have been necessary in some of these cases also, so that the licensees might have an opportunity to justify the inclusion of the unused vehicles. In order to allow full freedom for the rights of claimed tonnage to be enjoyed, and for trade recovery, the power under Section 10 (3) of the Act to remove from licences during the currency of the licences, vehicles which had ceased to be used, has only been exercised in three cases, during the present year, and those were cases in which the circumstances were very exceptional.

*Use of "C" licence vehicles for hire or reward in emergency.*

Under the provisions of Section 2 (4) of the Act, I am empowered, in a case of emergency, to authorise the holder of a "C" licence to use an authorised vehicle for the carriage of goods for any person to whom he lets the vehicle, if I am satisfied that the needs of that person cannot conveniently be met from other sources. In exercise of this power, I authorised the use of 22 "C" licence vehicles for the carriage of Post Office mails and parcels during the Christmas period. In each case I required a certificate in writing from the Head Postmaster of the district that all practicable steps had been taken to procure the services of the holders of "A" and "B" licences, but that, in the absence of a sufficient number of "A" and "B" vehicles, it was necessary to employ the "C" licence vehicle in respect of which application had been made. In each case also I made it a condition of granting authority to use a "C" licence vehicle that the holder of the licence should for the period of the authority pay to the driver the wages which would be payable by the holder of an "A" or "B" carrier's licence.

*Vehicles transferred from "B" licences to "C" licences.*

A tendency has been manifested for vehicles previously operated under "B" licences to be transferred to "C" licences. In some cases there is reason to think that this change has been effected in order to avoid the payment of wages on the scale of drivers of "B" licence vehicles, but no doubt in other cases the cause has been the desire to obtain the lower insurance rates applicable to "C" licence vehicles.

*Trailers drawn by private cars.*

There is also some tendency towards the use of private cars and trailers for the carriage of goods in order to avoid the necessity for a "C" licence. Inquiries are frequently received as to the possibility of using such vehicles for carrying goods for or in connection with the owner's business without a "C" licence, but the number of recorded cases in which this is done is not at present very large. There are no doubt many trailers used in this way of which no record exists, and it is probable that the number will increase, particularly if there is any increase in the rates of wages payable to drivers of "C" licence vehicles.

*Appeals.*

At the date of my last Report six appeals were outstanding and had not been decided. These represented two appeals by objectors against a decision to grant a licence and four appeals by objectors against two decisions to grant variations of licences. During the year 14 appeals have been lodged. These represented one appeal by an objector against a grant, four appeals by objectors against the grant of a variation of a licence, five appeals by applicants against refusal to grant licences, three appeals by applicants against refusal to grant variations of licences and one appeal by applicant against the condition attached to his "B" licence. The total of 20 appeals affecting 14 cases were dealt with as follows:—

Five Orders were made affecting 11 appeals, two appeals were withdrawn, three were dismissed and four are still outstanding.

*Maintenance of vehicles.*

During the year ending 30th September, 1936, the Vehicle Examiners in the Area have carried out 28,011 inspections of goods vehicles, and have issued 3,281 notices under Section 17 (3) of the Road and Rail Traffic Act, 1933, prohibiting

the use of vehicles which were or were likely to become unfit for service owing to defects which were disclosed by the examination. In 2,050 of these it appeared to the Examiners that the defects did not involve such immediate risk to public safety that it was necessary to prohibit the use of the vehicles forthwith, and the notices were issued to come into operation after the expiration of periods varying from one to ten days, if at the expiration of the interval stated, the Examiners should not be satisfied that the defects had been or were in course of being remedied. In 1,231 cases, however, it was necessary to prohibit the use of the vehicles forthwith. There have been no cases in which the owners of vehicles have desired to dispute the decision of the Vehicle Examiners as to the fitness for use of the vehicles, and have applied to have the vehicles inspected by a Certifying Officer, and there have been no appeals to the Minister against refusals to remove prohibitions.

Included in the 28,011 inspections above referred to, were 3,405 second and 300 third examinations of the same vehicles, these being chiefly in the case of vehicles which were prohibited and had to be inspected in order to lift the prohibitions. It will be seen that the number of immediate prohibitions was high in proportion to the number of delayed prohibitions. This indicates that vehicles which were found to be mechanically defective were in the majority of cases in a condition which could only be regarded as serious. The chief defects of a serious character were related to steering which represented approximately 25 per cent. and to brakes which represented approximately 13 per cent. of all defects necessitating prohibition. The condition of vehicles in the Area shows some improvement and there have been many replacements of worn out or obsolete vehicles in order to avoid action by the Vehicle Examiners. In a few cases whole fleets of vehicles which were unsuitable for their particular work, and necessitated heavy maintenance costs, have been replaced by stronger vehicles. There have also been very large numbers of replacements of vehicles by operators who desired to obtain greater carrying capacity in proportion to unladen weight, or to substitute vehicles capable of being operated at a higher road speed, or which were more easily manoeuvred in traffic or in loading bases. These substitutions have assisted in the generally improved condition of vehicles in operation. Among vehicles scrapped or removed from the road, 192 were actually under prohibition at the time. Particular attention has had to be paid by the Vehicle Examiners to vehicles subjected to abnormal usage, such as those operating to building estates over unmade roads, and to sand and gravel pits. Although the difficulties of the operators of such vehicles in maintaining them are admittedly greater than the difficulties of the operators of ordinary vehicles, the operators' responsibility is greater, by reason of their knowledge of the rough treatment to which the vehicles are subjected, and of the stricter supervision necessary to ensure that they shall not be a danger when operating on public roads.

#### *Licensing of Drivers of Heavy Goods Vehicles.*

The arrangements referred to in my last Report, whereby, in the case of approved firms and companies employing not less than 250 drivers, I have agreed to accept, for the issue of heavy vehicle drivers' licences to their employees, certificates of tests issued by approved examiners employed by such firms and companies have been continued and extended. The number of firms now approved for this purpose are 21, and I am of opinion that this procedure has had the anticipated effect of encouraging large employers of labour to develop organisations for training drivers, and has assisted in the realisation of the importance of proper training for drivers. Similar arrangements have been made with the Army and are being made with the Royal Air Force, in order to assist Army and Air Force personnel in obtaining drivers' licences on leaving Government service. The number of drivers who passed driving tests conducted by the examiners of commercial firms and by the Army examiners were 2,365, of whom 674 were also tested and granted certificates under Section 6 of the Road Traffic Act, 1934, for ordinary drivers' licences.

The great majority of the applicants for heavy goods vehicles drivers' licences were tested by the Vehicle Examiners, who conducted 6,352 tests. Of these 380 were also tested for an ordinary driver's licence under Section 6 of the Road Traffic Act, 1934. The number who failed to pass the dual test was 46, and the number who failed in the test for heavy goods drivers' licences only was 447.

It will be seen that those who failed in the dual test amounted to about 12 per cent. of those tested, while in the case of candidates for the heavy goods vehicle driver's licence only, who naturally had longer experience, the percentage of failures was about 7.5 per cent.

The detailed results of the tests, and the particulars of applications for, and heavy goods drivers' licences granted, are set out below. It will be seen that the total number of these licences issued during the year was 30,507.

*Driving Tests Conducted by Area Vehicle Examiners.*

	Passed test. ..			Failed test.		
	Sec. 6 and 31.	Sec. 31 only.	Total.	Sec. 6 and 31.	Sec. 31 only.	Total.
First tests ... ..	321	5,401	5,722	42	425	467
Re-tests :—						
First... ..	12	120	132	3	18	21
Second ... ..	1	4	5	1	4	5
Total ... ..	334	5,525	5,859	46	447	493

*Licences to Drive Heavy Goods Vehicles.*

No. of applications.	First applications.	Renewal applications.	Total.
Received (including applications outstanding from previous year) ... ..	29,373	4,713	34,086
Granted, and licences issued ... ..	25,906	4,601	30,507
Refusals notified :—			
Failed test ... ..	590†	—	590
Other reasons ... ..	38	—	38
Withdrawn ... ..	2,329	—	2,329
Awaiting decision ... ..	510	112	622*

Number of drivers of heavy goods vehicles licensed to date, 45,039.

\* Includes 363 cases where test is necessary.

† In the majority of cases candidates who failed to pass the test carried out by private firms are not included in these figures, but the figure of 590 includes a proportion of such who had made their applications separately, or whose failure had for some reason been specially reported.

*Enforcement.*

The enforcement of the provisions of the Act has continued to require very close attention. As I have already explained the fact that hitherto it has not been compulsory for the great majority of vehicles, viz., those authorised under "C" licences, to display identity certificates, enabled many persons operating goods vehicles without licences to avoid detection. That difficulty will, however, be removed in the future. The importance of the provisions of the Act in regard to hours of employment of drivers made it desirable that the Area Traffic Examiners should devote their time, so far as possible, to the inspection of drivers' records. A very great deal of time has been devoted to the instruction of operators in regard to their responsibility for ensuring that proper records are kept by drivers. It was to be expected that at first licence holders might not fully appreciate their obligations in this respect. It should, however, be remembered that every licence issued contains a notice calling the attention of the holder to his duties under the licence. It has also been the practice in the Metropolitan Area to send out with every licence a short notice in large print warning licence holders of the need for compliance with the law as to records. In addition to this, a special warning printed in large type has recently been sent to every holder of a "C" licence with the identity certificates which, as already explained, have now been issued for use on "C" licence vehicles. Copies of this warning are also sent to every licence holder on renewal of a licence. This warning calls attention to the importance of checking drivers' records regularly, as shown by a decision of the High Court in which it was held that the responsibility for the keeping of



records is a responsibility of the employer which cannot be discharged merely by issuing instructions to the drivers employed by him. Unfortunately evasion of the law as to drivers' records and drivers' hours is still very widespread indeed. This evasion of the law has undoubtedly been greatly encouraged by the fact that in a large number of cases the penalties inflicted by magistrates for failing to cause proper records to be kept, or for permitting drivers to be employed for excessive hours have been very small indeed, or merely nominal, even where convictions have been recorded. In very many cases where it has been proved in evidence that excessive hours have been permitted on a number of occasions by the same employer, the summonses have been dismissed under the Probation of Offenders Act. In any particular case the responsibility for deciding what, if any, penalty should be inflicted is, of course, the responsibility of the magistrates who have heard the evidence. I must accept the decisions in such cases as being appropriate, but it is unfortunate that the result should have been to encourage the view that offences of this character which are very liable to result in accidents and endanger life by reason of the employment of tired drivers, are not serious offences against the law. It is unfortunate from the standpoint of employers themselves, because where warnings and prosecutions fail in their purpose of ensuring observance of the law, I shall only have one course left, and that is to exercise my jurisdiction to suspend or revoke licences. I have not yet exercised that jurisdiction except to suspend three licences for short periods where there had been serious breach of licence conditions.

In the great majority of cases where the inspection of drivers' records disclosed offences consisting of failure to cause the required particulars to be recorded, or of employment of drivers for excessive hours, the offender was not prosecuted, but was merely warned or given advice. In more serious cases the offenders were prosecuted. The following table shows the result of proceedings instituted by me.

*Summonses.*

	Pending at 30.9.36.	Withdrawn.	Dismissed.	P.O. Act.	Convicted.	Total.
Sec. 19, 1930 Act : Con- travention of limits of time for which drivers may be employed ...	89	39	23	62	296	509
Sec. 16, 1933 Act : Failing to keep or cause to be kept drivers' records...	46	21	3	34	94	198
Other offences ...	3	—	—	6	28	37
	138	60*	26	102	418	744

\* This figure chiefly represents summonses withdrawn because convictions were obtained on alternative summonses.

As already stated the Area Traffic Examiners have had to devote a very large amount of time to the examination of drivers' records, and to advising operators in regard thereto. This has only been possible as a result of the very valuable work which has been done by the Metropolitan Police in enforcing other provisions of the Road Traffic Acts. The Commissioner of Police of the Metropolis has recognised that the requirements of the Road and Rail Traffic Act, 1933, as to the maintenance of goods vehicles and as to the obligation of drivers of goods vehicles to carry records, are safety provisions designed to prevent accidents, and that the registration of goods vehicles under the licensing provisions of the Road and Rail Traffic Act, 1933, is an important aid to the enforcement of these safety provisions. The Metropolitan Police have therefore in the course of their ordinary duties kept observation for breaches of the law in this respect. They have issued large numbers of cautions and have obtained a great many convictions for such offences. The cases dealt with, and the results of their action are set out in the following table. The Area Vehicle Examiners and Traffic Examiners have co-operated with them wherever possible, although the time of the Traffic Examiners has, as already stated, been chiefly devoted to investigation of hours of drivers employment.

## Return of Certain Offences relating to Motor Goods Vehicles dealt with by the Metropolitan Police.

Offence.	Cases reported.			Results of prosecutions.				
	Total.	Cautions.	Prosecutions.	Convicted.	Guilty discharged under P.O. Act.	Dismissed.	Adjourned sine die.	
(1) Using a goods vehicle without a carrier's licence ... ..	1,473	44	1,429	1,056	312	57	4	
(2) Failing to keep records of work ... ..	3,880	2,726	1,154	872	220	60	2	
(3) Using a prohibited vehicle ... ..	16	2	14	14	—	—	—	
(4) Defective maintenance	Brake offences ... ..	1,247	51	1,196	936	153	85	22
	Vehicle in such a condition as to cause danger ... ..	848	46	802	614	96	81	11
	Noise offences* ... ..	2,101	1,375	726	526	158	42	—
	Defective tyres ... ..	2,253	1,493	760	612	98	49	1
(5) Overloading ... ..	2	2	—	—	—	—	—	
(6) Excessive speed ... ..	9,320	1,132	8,188	7,556	552	76	4	
(7) Excessive hours of drivers... ..	28	3	25	16	1	8	—	
(8) Miscellaneous... ..	No H.G.V. driver's licence ... ..	260	245	15	14	1	—	—
	Employing driver without H.G.V. driver's licence ... ..	224	212	12	10	2	—	—
	Using or lending a carrier's licence, plate mark or other document ... ..	3	1	2	1	—	1	—
	Failing to produce carrier's licence, records of work or other document ... ..	485	475	10	9	1	—	—
	Breach of conditions of carrier's licence ... ..	9	6	3	1	1	1	—
	Other offences in connection with carriers' licences, identity certificates and records of work ... ..	464	452	12	9	2	1	—
	Other offences under Regulations made under the R. & R.T. Act, 1933 ... ..	101	94	7	4	—	2	1
Total ... ..	22,714	8,359	14,355	12,250	1,597	463	45	

\* Includes offences under Regulations 69, 70, 71 and 73 of the Motor Vehicles (Construction and Use) Regulations, 1931, but excludes sounding of horn during prohibited hours. Separate figures for offences due to defect or lack of repair are not available.

No record is compiled of police prosecutions in the Metropolitan Area outside the Metropolitan Police district, but the following is a record of convictions obtained and cautions issued by police authorities outside the Metropolitan Police district in respect of Metropolitan Traffic Area vehicles.

*Record of Convictions and Cautions relating to Metropolitan vehicles notified by Police Authorities outside the Metropolitan Police District.*

	No licence.	Using an unauthorised vehicle.	Failing to keep records.	Section 19.
Convictions ... ..	35	10	479	38
Cautions ... ..	—	2	25	1

	Over-loading.	Defective maintenance.	Using a prohibited vehicle.	Excessive speed.	Other offences.	Total.
Convictions ... ..	76	293	4	1,272	390	2,597
Cautions ... ..	10	18	—	62	18	136

As I explained in my previous Report, careful records are kept of breaches of conditions of carriers' licences, so that any necessary action may be taken. No licences have yet been revoked, and I have up to the present only suspended three licences for periods of a week, a fortnight and a month respectively. Cautions have, however, been administered in a large number of cases, and several Public Inquiries have been held to investigate cases where licence holders appeared to be failing to take reasonable precautions to observe the conditions of their licences as to maintenance of vehicles, employment of drivers and compliance with speed limits or the special conditions of "B" licences. Large numbers of warnings have also been issued to drivers holding licences to drive heavy goods vehicles, where they have been convicted on more than one occasion, or for a particularly serious offence. Where it is shown by the records that the drivers employed by any particular firm have been convicted of a number of offences having regard to the number of their licensed vehicles, investigations have been undertaken to ascertain whether the employers or the conditions of employment were the cause. There is no doubt that it will be necessary to take much more severe action in some cases, but for the present, the warnings that have been issued, and the Public Inquiries which have been held, have had a salutary effect on those immediately concerned and others.

*Enforcement as to Wages and Conditions of Service.*

I have received during the year 40 representations from the Observance Committee of the Area Joint Conciliation Board that employers were not paying wages and observing working conditions in accordance with Section 93 of the 1930 Act, and these have been communicated by me to the employers concerned, and to the chief conciliation officer of the Ministry of Labour. In 30 cases the complaints have been withdrawn by the Observance Committee on the ground that satisfactory assurances had been obtained that the schedule of wages and working conditions in accordance with the area agreements would be observed. The remaining 10 cases are still in the hands of the Chief Conciliation Officer, action not having been completed. There is no doubt that the provisions of Section 93 of the 1930 Act are being evaded in many cases, but as this matter has already been referred for investigation to a committee, it is not necessary for me to refer to it more fully.

*Drivers' Records.*

Two very interesting decisions have been given during the year by the High Court of Justice in regard to the records which drivers of vehicles authorised in carrier's licences are required to keep. In the first case (*Cox & Sons Ltd. v. Sidery*—decided on 25th October, 1935), the appellants appealed against a conviction for failing to cause to be kept a true record of the maximum weight of load carried by a goods vehicle. The driver had recorded 6 tons in his

record, but the vehicle was stopped and weighed, when it was found that the true weight of the load was 9 tons 9 cwt. The Divisional Court dismissed the appeal by the employers against their conviction by a court of summary jurisdiction, and held that the employers had not discharged their full duty under the Act by merely providing a form to be filled in; that the words of the Statute are imperative "The holder of a licence shall keep or cause to be kept", and that as correct records were not kept by the driver, the employers were liable under the Statute, and no question of mens rea could arise. In the other case (*Beer v. Clench*—decided on 4th March, 1936), it was held by the Divisional Court that a current driver's record, which a licence holder is required to keep or cause to be kept, is admissible as evidence against the licensee in a prosecution for permitting a driver to drive for excessive hours.

#### *Operation and Application of the Act.*

In my last Report I said that it was then too early to state what might be possible in overcoming the various difficulties illustrated in that Report to which both road and rail transport might be subject, or what form of transport might ultimately be most in accord with the interests of industry for the carriage of particular goods; that such questions could not be answered until the existing condition of strain in the industry had been removed, and more economic conditions for all forms of transport had resulted from the provisions of the Act and the licensing procedure. I further suggested that if all forms of transport were able to develop fully the advantages which they can respectively offer, it is manifest that controlled transport competition will confer very important benefits on British industries.

The importance of transport from a national industrial standpoint can hardly be exaggerated, and it seems to be necessary, therefore, to refer to a suggestion which has been made in one or two directions that industry has suffered inconvenience and loss through a shortage of road transport resulting from licensing control. Such suggestions are without any present justification. When the licensing procedure was introduced, there was an immense reserve of transport available in excess of public need, and under the licensing procedure, great elasticity exists. There is abundant evidence that a very large amount of claimed tonnage has never been taken up, because the licensees have been unable, notwithstanding the improvement in trade, to find work for it. In addition to claimed tonnage, not taken up, large numbers of vehicles specified in licences have not been used, and it is no infrequent experience to find that vehicles forming a considerable percentage of large and of small fleets have not been taxed for months or years. This does not mean that all licence holders have been short of work; far from it. There has, throughout the road transport industry, been a great improvement in trade, and very many licence holders have found that they were unable to meet their customers' needs with the vehicles they had in 1934, when licensing control commenced. Many of them have increased the capacity of their fleets, both large and small, by substituting new and more efficient vehicles for old and obsolete vehicles. Many new vehicles have been put on the road under the provisions of Section 7 (i) of the Road and Rail Traffic Act, 1933, as contract licence vehicles. The greater part of any need which has existed for additional transport facilities, has, however, been met in the normal manner contemplated by the Act, namely by licence holders making application for additional vehicles and supporting their applications by evidence. A great deal has been said about the supposed difficulty of proving need for additional vehicles. It may very well be that transport operators who have realised the more prosperous conditions of the transport industry, and who would quite naturally desire to secure an increase of work under such conditions, sometimes find difficulty in supporting applications designed to enable them to secure a larger share of available work. Easy methods of satisfying the Licensing Authority that there is good ground for granting such applicants additional or larger vehicles are often liable to fail, because they tend merely to show that whatever work may be available is already being done by existing transport. In cases, however, where traders requiring to use transport are really in need of additional facilities, experience does not show that they have much difficulty in getting them, or in supporting applications by those whose function it is to provide and operate vehicles. Any real need can be, and is being, met. The

evidence which often does not avail to support an application is the kind of evidence provided by letters from traders who are willing, as customers, to support an applicant merely in the same way as they would give a testimonial to any employee, actuated by the feeling that it is the proper thing to do, or the evidence of those who desire to have as much transport as possible available at all times, so that they can pick and choose, regardless of whether vehicles can be properly supported if licensed, or who desire to employ a particular haulier because he charges lower rates than his competitors. Licensing control is not a control which has prevented the increase of vehicles consequent on increasing trade, or even on the flow of trade from one person, or one district, to another person or district. Competition and the varied influences which, in ordinary industry, result in the volume of trade done by one person increasing, while the volume of another's trade decreases, have similar effects and results in the transport industry. It is not to be anticipated, therefore, that the time will ever arrive when there will be in existence only such quantity of transport as may be required to meet public need. While need is extending in certain directions, and being provided for, need will be contracting in other directions, and leaving facilities and vehicles unemployed. This is the position in a state of expanding trade, and it would be accentuated if trade were falling. The effect, therefore, of licensing control is to restrain the more extreme manifestations of wasteful competition. In this respect it is generally to be distinguished from the licensing control of passenger services, which can to a great extent ensure that facilities shall not be authorised in excess of need, because the facilities and the need are identified with specified routes. Competition, therefore, is likely to have greater play in the case of goods transport, and where different systems of goods transport are in competition, it is of great importance to each system that it should be able to adapt itself readily to changing needs of industry, and any conditions or circumstances which affect the equality of the terms of competition will be likely to have far reaching consequences.

I desire to acknowledge the help which I have received from the police authorities in the Area, and the assistance and co-operation of the trade associations and of the transport industry. I also desire to record my great appreciation of the work done by the Clerk and the Staff of the Area.

I have the honour to be, Sir,

Your obedient Servant,

GLEESON E. ROBINSON,  
Licensing Authority.

## NORTHERN TRAFFIC AREA, SCOTLAND

To the Minister of Transport.

SIR,

I have the honour to present my second Report as Licensing Authority for the Northern Traffic Area, Scotland, in accordance with sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933.

The report covers the period from 1st October, 1935, to 30th September, 1936.

### Public Inquiries.

1. To suit the convenience of applicants Public Inquiries were held during the year at the following 22 centres:—

	No. of Inquiries.	No. of Days.
Aberdeen	20	26
Alloa	2	2
Arbroath	1	1
Banff	5	5
Cupar	2	3
Dingwall	3	3
Dornoch	1	1
Dundee	14	21
Dunfermline	9	12
Elgin	3	3
Fort William	1	1
Inverness	6	8
Kirkwall	1	2
Kyle	1	1
Lerwick	1	3
Lochmaddy	1	1
Mallaig	1	1
Perth	7	10
Portree	1	1
Stornoway	1	2
Tain	1	1
Wick	1	1
<b>Total</b>	<b>83</b>	<b>109</b>

### 2. "A," "B" AND "C" LICENCES—STATISTICS.

(a) TABLE I.—Applications for Carriers' Licences.

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences:—					
Currency Period	15	367	17	223	9
Short Term, Section 3 (3)	—	49	6	39	3
Contract	2	32	5	23	—
"B" Licences:—					
Currency Period	139	1,754	51	1,582	49
Short Term, Section 3 (3)	3	157	9	136	13
"C" Licences:—					
Currency Period	—	741	8	733	—
Short Term, Section 3 (3)	—	88	—	88	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..	"A": —	"B": —	"C": 2
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	"A": 49	"B": 27	
Short Term Administrative Licences issued (Section 3 (4) ) ...	"A": 6	"B": 11	
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ...	"A": 17	"B": 11	

(b) TABLE II.—*Applications for variation of Carriers' Licences.*

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles "A" Licences :—					
Published and dealt with at Inquiry ... ..	} 39	} 495	} 21	} 65	} 7
Published but determined without Inquiry ... ..					
Not published ... ..					
"B" Licences :—					
Published and dealt with at Inquiry ... ..	} 26	} 529	} 13	} 60	} 12
Published but determined without Inquiry ... ..					
Not published ... ..					
Variations of Conditions attached to "B" Licences...	15	71	15	50	8

(c) *Applications under Section 2 (4).*

Applications received ... ..	2
Applications granted (for the carriage of Christmas mails only)	2

(d) *Revocations and Suspensions.*

Public "A" Carrier's licence revoked (See Paragraph below)	1
Licences suspended ... ..	Nil

3. **OBJECTIONS.**

1. "A" Applications.—						<i>Lodged.</i>	<i>Pursued.</i>
New	...	...	...	...	...	33	33
Continuations	...	...	...	...	...	9	9
Section 11 (3) (b)*	...	...	...	...	...	4	4
Variations	...	...	...	...	...	73	70
Claimed Contract	...	...	...	...	...	3	3
Section 3 (3)	...	...	...	...	...	4	4
						126	123

\* *i.e.*, applications for licences to expire not later than the expiry dates of licences held by Carriers whose businesses applicants intended to acquire; the applications were made under Section 5, the provisions of Section 11 (3) (b) were invoked and licences were granted under Section 6.

## 2. "B" Applications:—

	<i>Lodged.</i>	<i>Pursued.</i>
New ... ..	159	159
Continuations ... ..	354	349
Variations (vehicles) ... ..	61	61
Variations (conditions) ... ..	47	47
Section 3 (3) ... ..	4	4
	625	620

..

*Revocation of a Licence.*

At a Public Inquiry held at Aberdeen in April, 1936, I enquired into alleged breaches of conditions of a Public "A" Carrier's Licence. The holder of the licence admitted a conviction in respect of an offence under Section 34 (1) (a) of the Road and Rail Traffic Act, 1933; a "Hired" Identity Certificate had been issued to this licence-holder and he had lent the certificate to another person to use on a motor vehicle with intent to deceive. Having considered all the circumstances, I revoked the licence, and severely warned the holder as to his future conduct and to the seriousness of failure to observe the conditions of another Public "A" Carrier's Licence which was held by him.

4. *Appeals.*

Number of Appeals lodged with the Appeal Tribunal ... ..	3
Decisions still pending ... ..	3

In each case the appeal was against the grant of an "A" licence. The appellants appealed because at the hearing of the applications I had held that the objections which they had lodged were incompetent.

5. *Maintenance of Vehicles.*

(a) Number of inspections carried out ... ..	6,349
Approximate number of vehicles covered by those inspections ... ..	4,670
(b) Number of prohibition notices issued ... ..	631
comprising—	
Immediate prohibitions ... ..	241
Delayed prohibitions ... ..	390
(c) Defects which have been mainly responsible for the issue of prohibition notices—	
Steering arms and ballpins ... ..	132
Steering stops ... ..	76
Steering column, box and drop-arm ... ..	246
Steering links (track rod and drag link) ... ..	249
Front swivel axles, bushes and pins ... ..	304
Front axle beam ... ..	20
Springs and anchors for same, front radius rods ... ..	277
Shackles, pins and bushes ... ..	258
Foot brakes and mechanism ... ..	227
Hand brakes and mechanism ... ..	286
Road wheels, studs, etc. ... ..	300
Frames, cross members, sub-frames and brackets ... ..	132
Rear axle and differential gear and case ... ..	23



Engine, gear-box and clutch, propeller shafts, joints and bearings	...	...	...	...	...	138
Exhaust system	...	...	...	...	...	71
Petrol system	...	...	...	...	...	38
Mud wings and bodywork	...	...	...	...	...	352
Water circulation	...	...	...	...	...	19
Others	...	...	...	...	...	155

(d) Appeals to Certifying Officer or to the Minister against  
the refusal to remove a prohibition ... .. Nil.

The Certifying Officer has reported to me on the subject of maintenance as follows:—

The general maintenance of goods vehicles belonging to the major operators is good. Where long-distance work is the rule, breakdowns or stoppages involve a considerable loss because of the class of goods carried and of the provisions of the operating schedules; consequently care is taken so that the vehicles are kept in good order. Short distance cattle-hauliers, small carriers and operators in remote districts pay less attention to maintenance and in particular, light lorries are subject to the superimposition of heavy and cumbersome cattle floats. In view of the recent High Court decision to the effect that a detachable float constitutes part of the load, and not of the vehicle, the attention of Examiners has specially been directed to the security of the load where such detachable bodies are used. Small operators in rural districts, having little mechanical knowledge, run their vehicles without attention until they stop, and they welcome official inspection as a means of ascertaining gratuitously the mechanical condition of their vehicles. Examiners have made a large proportion of their inspections under adverse conditions: at marts, in the street or in station yards and often during wet and inclement weather.

There are signs that the general standard of maintenance is slightly improving, but it is still very far from satisfactory. Numerous tests were carried out under the supervision of the Certifying Officer to ascertain efficiency of the brakes in goods vehicles of all classes and the results showed disquieting failure to maintain a reasonable degree of safety.

#### *Enforcement—Traffic Examiners.*

6. Three additional Traffic Examiners were appointed in August making a total of six Examiners in the Area. I have arranged for one Examiner to be stationed at Dingwall, and have under consideration the allocation of Examiners to other local headquarters where the needs of the work would justify that course.

The duties of the Examiners have covered a wide range of investigation and inquiry, but their efforts have been largely concerned with the enforcement of the statutory provisions regarding the limitation of time for which drivers of vehicles may remain continuously on duty. This involves the examination of the records which the drivers must keep under Section 16 of the Act of 1933.

For the most part, I am convinced that there is an honest desire on the part of licence-holders to comply with the requirements of the Acts and Regulations. On the other hand, a minority seek to contravene the provisions of Section 19 of the Act of 1930, and therefore to contravene also the conditions of their licences and they cover their traces with ingenuity and persistence worthy of a better cause. This subject is dealt with in the paragraph headed "Hours of Driving and Drivers' Records" (*infra*).

The Examiners have provided me with much useful information in regard to the observance of conditions of vocational licences and road service licences. Whenever possible, Examiners travel by public service vehicles in preference to other means of transport, when various statutory requirements in Part IV

of the Road Traffic Act, 1930, receive attention. Thus, in the ordinary course of duty, a constant watch is kept on the observance of time tables, fare tables and other conditions of Road Service Licences, and also on the conditions of vocational Licences.

#### *Indoor Staff.*

My indoor Staff has been limited to one Enforcement Officer with such part-time clerical assistance as it has been possible to allow. This officer was appointed in January, 1936. The volume of work was soon found to require additional staff and a further appointment is expected.

#### *Hours of Driving and Drivers' Records.*

I have already referred to the keeping of records and to the general position as disclosed by the enquiries of my Examiners. The minority of operators who consider that it is to their interest to contravene the statutory provisions regarding hours of driving and periods of rest, have recourse to a variety of method and subterfuge in order to make the detection of offences difficult, if not impossible. One such method, by this time generally known, is for a driver to keep records in duplicate. It is obvious that this report is not the place in which to enlarge upon the offences themselves or to discuss means of detection. I am, however, deeply conscious that the strict observance of the very reasonable terms of Section 19 (as amended) is an essential safeguard for public safety on the roads and for the health of the drivers and attendants who are directly concerned; in this way, also, the well-being of this great industry will be conserved.

#### *Co-operation with Constabulary.*

I have been gratified to find that my Examiners in all their work have received the valuable and ready assistance and co-operation of the Police Authorities. The result of this harmonious collaboration is a gradual improvement in the manner and extent in which holders of carriers' Licences are complying with the statutory obligations which are placed upon them as licence holders by the terms of the Act of 1933 and Regulations. It is no exaggeration to say that without the goodwill and help of Chief Constables my Examiners' work would be almost fruitless, but, as it is, I am satisfied that the results which my Examiners have been able to achieve, though restricted in extent owing to their small numbers, have had a salutary effect on the operators in the Area generally.

As regards initiation of prosecutions, the first step has always been to put forward the case to the Chief Constable within whose jurisdiction an alleged offence has been committed. The Chief Constable at his discretion has in turn referred the case to the Procurator Fiscal.

In some cases, the initiative has been taken by the Police, and at their request I have caused statements to be provided or have arranged for witnesses to attend at Court. Many other cases have been taken to the Sheriff without my participation, and it is more than gratifying that such ample support has been given by Chief Constables and their Staffs in the work of enforcement.

#### *Particulars of Offences.*

The following particulars of offences cover the eight months to September, 1936 (inclusive) with one or two exceptions; they do not include the cases mentioned in the last sentence foregoing, viz., those in which I have not participated.

## ENFORCEMENT—Particulars of Offences

(1) Statutory provisions contravened.	(2) No. of alleged offences.	(3) Offences referred to Police.	(4) Con- victions.	(5) Admon- ished.	(6) Cases dis- missed or not proven.	(7) Warning by Proc. Fiscal or Police.	(8) Not proceeded with for various reasons.	(9) Pending.	(10) Dealt with by L.A.
1. Section 1 R. & R.T.A., 1933. Using goods vehicle without a carrier's licence ...	52	52	33	4	2	4	3	6	—
2. Section 2 (4) R. & R.T.A., 1933. Using for hire or reward, vehicle authorised under a "C" Licence ...	1	1	—	—	—	—	1	—	—
3. Section 8 (1) (d) and 16 R. & R.T.A., 1933. The Goods Vehicles (Keeping of Records) Regulations, 1935. Failure to keep Records or to cause them to be kept ...	112	89	41	14	4	1	8	21	23
4. Section 8 (3) R. & R.T.A., 1933. Breach of special conditions of a "B" Licence ...	9	8	5	—	—	—	2	1	1
5. Section 16 (4) R. & R.T.A., 1933. Failure to preserve records ...	2	2	1	1	—	—	—	—	—
6. Section 17 (10) R. & R.T.A., 1933. Using vehicles while under prohibition ...	11	11	7	2	—	—	1	1	—
7. Section 19 R.T.A., 1930. Driving and/or employing persons to drive for hours in excess of statutory requirements ...	180	175	56	1	113	1	—	4	5
8. Section 34 (1) (a) R. & R.T.A., 1933. Using Identity Certificate issued to another person ...	1	1	1	—	—	—	—	—	—
9. Section 34 (1) (c) R. & R.T.A., 1933. Altering entry in record ...	10	9	8	—	—	—	1	—	1
10. Section 34 (3) R. & R.T.A., 1933. Making a false statement for purpose of obtaining grant of a licence ...	1	1	1	—	—	—	—	—	—
11. Section 31 (1) R.T.A., 1934. Driving heavy goods vehicle without a licence ...	5	5	3	—	—	—	—	2	—
Employing unlicensed person to drive ...	5	5	3	—	—	—	—	2	—
12. Goods Vehicles (Licences and Prohibitions) Regulations, 1936, Art. 12 (2). Failure to display Identification Certificate or required particulars on vehicles used under a "C" Licence ...	6	5	1	2	—	—	1	1	1
13. Goods Vehicles (Licences and Prohibitions) Prov. Regulations, 1934, Art. 21. Failure to return Licence and Identity Certificate on ceasing to be owner of vehicle ...	1	1	—	—	—	—	—	1	—
14. Motor Vehicles (Construction and Use) Regulations, 1931. Defective Brakes, Tyres, etc. ...	142	136	97	15*	4	2	8	10	6
15. Miscellaneous. Finance Act, 1920, Section 13 ... Roads Act, 1920, Section 8 ...	2	2	1	1	—	—	—	—	—
	540*	503†	258	40	123	8	25	49	37

\* Total of column (2) = Totals of columns (3) + (10).

† Total of column (3) = Totals of columns (4) to (9) inclusive.

*Appeal to the Court of Session.*

A firm of hauliers whose business is extensive and whose operations spread far beyond the southern boundary of the Area were convicted at a Sheriff Court and very heavily fined for a number of offences against the provisions of Section 19 (1) (i) and (ii) of the Road Traffic Act, 1930. The conviction, however, was set aside on appeal to the Court of Session, on the ground that the accused had been wrongly libelled. The point at issue was the interpretation of what has been usefully called "Constructive Driving"; although this term has no legal currency. The appeal was sustained by the Court of Session because the evidence was considered insufficient by that Court to enable such time to be reckoned as time spent in driving. The offences are not included in the statistical details in the foregoing statement.

I have dealt with the difficult subject of "Speeding" in the following Section.

7. *LICENCES TO DRIVE HEAVY GOODS VEHICLES.**Road Traffic Act, 1934.**Sections 31 and 32.*

Number of Applications.	Number of Applicants tested by Area Examiners.	Number of Applicants tested by other Authorised persons.
Carried over from previous year ... .. 876	Passed at first test ... 538	Passed ... .. 31
Received ... .. 1,188	Failed at first test ... 10	
Withdrawn ... .. 291	Passed at subsequent test 5	
Granted ... .. 1,726	Awaiting further test ... 5	
Refused ... .. 9	Failed entirely (licence refused) ... .. —	
Still in action ... .. 38		
Total Applications ... 2,064	Total Tests ... .. 553	Total Tests ... 31

Of the nine applicants who were refused a licence, six were considered not fit persons, two were under age, and one (under age) knowingly made a false statement concerning his date of birth for the purpose of procuring a licence. I revoked four licences.

During the previous period, two appeals had been made to the Sheriff against (1) the revocation of a licence (2) the refusal of a licence. In the first case the Sheriff ordered the removal of the revocation but suspended the licence for one month from the date of his hearing of the appeal; in the second case he dismissed the appeal.

As in the previous year, the applicants whose applications were withdrawn were in the majority of cases unable to provide suitable vehicles for a test.

I would invite your special attention to the subject of "Speeding". Chief Constables throughout the area notified me of nearly 500 cases in all, in which convictions had been recorded against drivers of goods vehicles for the offences of speeding and careless or reckless driving; the majority of the offences were speeding. Speeding is a highly dangerous practice which jeopardises all road users.

I summoned to appear before me, as Licensing Authority, all applicants for licences to drive heavy goods vehicles and all holders of such licences against whom two or more convictions had been recorded for speeding and associated offences. It was necessary to take these cases during the adjournment intervals at Public Sitings and Inquiries. In this way I personally saw 29 applicants and 34 holders and considered each case with great care. The result was that five applicants were refused licences (included in the six cases mentioned in the foregoing); the licences of three holders were suspended, and those of four other holders were revoked. The remaining applicants and licence holders were severely warned.

It has come to my knowledge in several cases that the fines imposed on drivers on being convicted for speeding and associated offences have been paid by their employers, the holders of Carriers' Licences. This seems to me to be a

pernicious practice which should be discouraged as it goes a long way to defeat the ends of justice and the purpose of the legislation under which conviction was recorded.

#### *Long Distance Haulage.*

8. The long-distance haulage originating in this Area caters chiefly for the carriage of (1) fish from Aberdeen and ports on the north-east coast to Glasgow, Manchester, Liverpool, Birmingham and London; (2) jute and jute goods from Dundee to the midlands of England; (3) paper from many important mills in Aberdeenshire and Fife to destinations in various parts of Great Britain; (4) livestock from Inverness and the counties north and west thereof and from Aberdeen to Perth, Stirling, Glasgow, Kelso and northern England; and (5) coal from the Fife coalfield to the rural districts of the counties to the north and west.

Applications for the grant of licences, or for the variation of licences to increase a fleet, for the carriage of fish have met with determined objection by the Railway Companies on the ground that the traffic was "false"; on the other hand, it has been contended at Public Inquiries that transport by road was advantageous because the lorries were not tied to fixed times of departure, and thus the curers and fresh fish merchants could permit themselves more time to prepare the fish than if obliged to work to a time table; a further contention was that transport by road saved double handling.

An instructive example of the respective advantages of transport of fish by road and by rail occurred in December, 1935, when the journeys involved traversing widespread areas of fog and long stretches of icy surface. The skill and tenacity of the drivers enabled them in the first day or two to reach their destinations in time for the markets, whereas rail-borne loads were late through being delayed by fog. In the course of a few days, however, the difficulty of driving on roads whose ice-bound conditions grew worse, resulted in the advantage being transferred to the fish trains. At that time, also, a hard lesson was learned as to the financial responsibility resting on carriers who maintained regular long-distance services for fish, since, according to a Press Report, the vehicles of a certain carrier sustained damage to the extent of over £1,000.

The City of Dundee (known facetiously as "Juteopolis") has been the home of the jute industry for several generations, and the chief shipments of the raw material are landed at this port, the vessels coming direct from India to Dundee. A part of the raw material is destined for other places, principally the manufacturing towns in the midlands of England, while there is a ready market for the manufactured goods in the many towns of the northern and midland counties; thus an extensive haulage industry has grown up for this traffic.

Livestock is carried in an increasing volume from the Western Highlands and the Northern Counties to Inverness, Dingwall, Lairg, Aberdeen and other large markets. I indicated in my first report the arguments adduced at Public Inquiries for and against the transport of livestock by road. A new feature is the increased use of motor transport to ensure a quick concentration of sheep at the larger sales, instead of walking the flocks to the sales, a process which might occupy a week or more and involve feeding and watering en route. This traffic is carried during the hours of darkness. 30,000 sheep were brought by motor floats in a single night to a sale in Aberdeen. I was recently informed that the stock at a pedigree cattle sale arrived as follows:—by rail, 20; by road transport, 408; and after sale were despatched, 48 by rail and 380 by road transport.

Coal is carried mainly from the Fife coal pits to country districts where transport by rail would entail cartage from the railhead to the farms by means of horse-drawn vehicles. Evidence has been led at my Inquiries by prominent agriculturists to the effect that the present methods of road-surfacing militate against the use of horse-drawn vehicles, especially in winter; farmers have assured me that only in urgent circumstances would they hazard the use of horse-drawn vehicles on the main roads in view of the possibility of having to destroy an animal disabled by a fall. The agriculturist himself is making a greater use of motor haulage than hitherto, particularly for the transport of grain and potato crops, for he is thus able to save time and release labour for farm routine when it is most required as at spring-time and harvest.

*Orkney and Shetland, Skye and the Outer Hebrides.*

9. The users of goods vehicles in these islands have shown a commendable readiness to comply with the Act and Regulations. On my recent visits for the purpose of holding Public Inquiries every applicant attended personally or was represented by an agent. All the applicants for "B" licences expressed their satisfaction with the standard conditions which I had framed for such licences and it is noteworthy that there was no complaint by "A" Carriers that traffic had been abstracted by "B" Carriers, or that the latter had been charging lower rates.

In the Outer Hebrides the motor vehicle is replacing not only the horse-drawn vehicle but also the bowed figure of the crofter's wife trudging home with her creel of fifty peats.

In Skye, early in 1936, owing to the scarcity of foreign marble following the application of "Sanctions" there was a heavy temporary demand for additional tonnage to serve the unexpected revival of marble quarrying.

I am happy to record that in the island districts the vehicles now in use are for the most part of a better type than formerly, and improvement is discernible in the standard of maintenance.

*Hiring Margins.*

10. Section 2 (6) (b) and (c) of the Act provides for vehicles and trailers to be hired. Many carriers who on their first application for a licence did not find themselves in a position to purchase vehicles to the full extent of their claimed tonnage applied for the balance as vehicles or trailers to be hired. In most cases, the seeming advantage of having this tonnage licensed has been illusory; because although the need has duly arisen to hire vehicles to satisfy the requirements of an operator's regular customers, other operators have emphatically refused to hire their vehicles as chattels; indeed, in numerous instances suitable vehicles have not existed in the particular locality.

*Private Carriers' Licences.*

11. In order to enable the holders of Private "C" Carriers' Licences to comply with the Goods Vehicles (Licences and Prohibitions) Regulations, 1936, by displaying an Identity Certificate on each authorised vehicle, the certificates were prepared and issued some three months in advance of the appointed date, 1st October, 1936. The heavy correspondence which immediately followed the issue disclosed that hundreds of vehicles which were still authorised under licences were no longer in the possession of the licence-holders and that new vehicles had been obtained without notice to the Licensing Authority. A large number of licence-holders were unable to produce their licences for variation and eventually admitted that they had lost them; other licensees had failed to notify changes of address and were only traced with difficulty. The administrative task was difficult because of the paucity of the information originally demanded from the Private Carrier Applicant, and because of the scanty knowledge of the Act and Regulations amongst this class of road users.

One important result of bringing the Private Carrier within the legislation is that small business owners dispose of their vehicles and employ instead private motor cars drawing trailers. The object is to evade the statutory provisions obliging the licence-holder to keep or cause to be kept records of journeys, hours and loads. Such private vehicles are exempted from the licensing provisions of the Act by virtue of Section 1 (7) (b), but their use for livestock (in one case, a pair of heavy draught horses) was obviously not contemplated when the exemption was framed, and bitter complaints have reached me regarding this "top-hat" form of haulage. While it is true that the carriage of goods for hire or reward in this class of vehicle must be authorised by an "A" or "B" licence, I have grounds for suspecting that in certain agricultural areas considerable use is made of these unlicensed vehicles for carrying goods for a consideration; the offence, however, is difficult to detect.

*Wages and Conditions of Service.*

12. Having in mind the terms of reference of the Joint Committee set up by you, Sir, and your colleague, the Minister of Labour, on the "Regulation of Wages and Conditions in the Road Transport Industry (Goods)" I have furnished the Committee with complete particulars in regard to this Area and in view of the fact that the recommendations of the Committee have not been made known, I refrain from making any observations hereon.

*Press.*

13. It gave me great pleasure when preparing my first report as Licensing Authority to acknowledge my gratitude to and appreciation of the Press. Throughout the past year, I have again been pleased to observe from time to time the adequacy and accuracy with which my Inquiries have been reported and to find how helpful and constructive have been many leading articles and comments in the daily papers. There have been occasions on which Press cuttings which I have caused to be filed have been of the greatest service. I wish also to include the Trade Press in my appreciation; one realises that their purpose has a particular direction and that their scope extends only to a particular group of interests, but on the whole my experience has given me confidence in their work.

In my opinion, generally speaking, the journalism both of the newspapers in this Area and of the Trade papers reaches a consistently high level.

*Staff.*

My staff have again given loyal and energetic service, and have on many occasions voluntarily worked beyond normal hours in order to deal with special pressure of work.

I have the honour to be,

Sir,

Your obedient Servant,

HENRY RICHES,  
Licensing Authority.

## SOUTHERN SCOTLAND TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to submit my second annual report as Licensing Authority for the Southern Scotland Traffic Area in accordance with the provisions of Section 23 (4) of the Road and Rail Traffic Act, 1933. The report covers the year commencing on the 1st October, 1935.

### *Procedure at Public Inquiries.*

2. Many of the difficulties that loomed so largely in my first report I now accept as being inevitably associated with the introduction of an enactment which, being designed to secure control and regulation in such a large industry as that of road transport, affected many interests. The machinery for licensing and for the ancillary tasks associated with it is now working smoothly.

3. Whilst it cannot by any means be claimed that procedure is perfected, it is now possible to adopt routine and method to a much greater degree than seemed possible a year ago. More and more, set customs and rules are practised in the handling of cases and this tends to expedite their passage through my public inquiries. Without attempting to achieve a stereotyped form of evidence or fixed requirements as to what information is required, these are now taking definite shape.

4. In the industrial centres the various Road Carriers' Associations have done helpful work and usually present their evidence and information in the form and manner desired. The cases affecting their members are handled by law agents who customarily attend inquiries and so have become well practised.

5. The Railway Companies invariably entrust their applications and objections only to members of their own legal staffs and this greatly expedites the work, the evidence and arguments being usually confined to essential features.

6. In the cases from rural districts and smaller towns the carriers are not well organised and it is here I find much waste of time. The agents and carriers not being well versed in procedure, nor always able to discern what evidence is needful, often come ill prepared and spend much time on useless matter.

7. Keenly contested cases in any district, particularly those involving evidence from numbers of witnesses must always take time. One matter that occasions me some anxiety is the arrangements of case lists so that there is no avoidable waste of time for those affected. Nevertheless, an unexpectedly long case frequently upsets a planned programme.

8. To assist me in expediting inquiries, I have issued a circular suggesting the form and character of evidence that should be available. A copy of this circular is sent to each applicant.

### *Public Inquiries.*

9. Public Inquiries for the hearing of applications for "A" and "B" licences or for variation of licences already granted were held on 83 days. They took place at Brodick, Dumfries, Edinburgh, Glasgow and Oban.

10. It is estimated that approximately 75 per cent. of the applicants, who were required to attend public inquiries, secured the assistance of law agents either individually or through their associations. This compares with my figure for the previous year of about 50 per cent. The searching cross-examinations by the Railway Companies of applicants and their witnesses have undoubtedly convinced road carriers that they require legal aid in the presentation of their cases.

11. Of the objections lodged about 90 per cent. came from the Railway Companies.



12. The following statistical return gives a summary of this work during the year:—

*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>"A" Licences :—</b>					
Currency Period ... ..	23	436	39	249	38
Short Term, Section 3 (3) ...	—	11	—	8	1
Contract ... ..	—	87	—	86	1
<b>"B" Licences :—</b>					
Currency Period ... ..	349	2,160	89	1,931	124
Short Term, Section 3 (3) ...	—	8	—	8	—
<b>"C" Licences :—</b>					
Currency Period ... ..	—	1,065	—	1,065	—
Short Term, Section 3 (3) ...	—	89	—	89	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... .. "A": — "B": — "C": —

Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... .. "A": — "B": —

Short Term Administrative Licences issued (Section 3 (4)) ... .. "A": 7 "B": 119

Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) "A": 1 "B": —

*Applications for variation of Carriers' Licences.*

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>Variations relating to vehicles</b>					
<b>"A" Licences :—</b>					
Published and dealt with at Inquiry ... ..	} 26	} 1,151	4	192	66
Published but determined without Inquiry ... ..			30	19	—
Not published ... ..			—	845	—
<b>"B" Licences :—</b>					
Published and dealt with at Inquiry ... ..	} 12	} 804	3	87	30
Published but determined without Inquiry ... ..			16	17	—
Not published ... ..			—	654	—
<b>Variations of Conditions attached to "B" Licences...</b>	5	76	8	43	29

13. In the matter of granting short period licences under Section 3 (3) I have found it necessary to inquire very closely into the circumstances in those applications in which sufficient time had not been given for publication. I am inclined to think that some of these applications are prompted by dealers who are anxious to dispose of vehicles and in other cases because the carrier hopes thereby to assist his case for a full term licence. One motor salesman, more enterprising than truthful, convinced a lowly hawker of firewood, who desired to add carrying to his means of livelihood, that he must first secure a vehicle

and get a "C" licence and six months later would automatically qualify for a "B" licence. The forms of application were supplied by the salesman. With some reluctance I refused this application.

#### *Contracts and Contract Licences.*

14. In this reference I use the word contract in the sense it is used in the Act. There is no doubt that much work that could be performed under contracts is not in that position. The carriers do not desire to be placed under such a bond preferring that they should be free to use the vehicles for other work should occasion arise. The trader wishes to have placed at his disposal vehicles whenever he requires them without being under any fiduciary obligation between times. Whilst it is essential that transport should be and remain a service with the fullest possible flexibility, the present position in this respect is open to abuse. Oft times when a carrier seeks authority to use an additional vehicle, inquiry proves it to be justifiable solely in consequence of the needs of one customer. The need exists and the additional vehicle is justified. Given the existence of a definite contract no doubt as to the granting of a licence would arise. Doubt is present because the vehicle may be used for other purposes and no restriction preventing this is possible. On the other hand, traders not being obliged to pay for the sole use of the vehicle do not organise their distribution or output, relying on obtaining service just when they wish it. The result is that there is often present an element of urgency in delivery that could be avoided by the exercise of more method and forethought. This very factor of urgency is frequently pressed upon me as a reason for granting an application and it is stressed that the Railway Companies by their very nature cannot meet this need of trade.

15. I am of the opinion that much work performed by carriers for local authorities could be done under a more definite form of contract than is the present rule. There must always be a free margin, but it seems hardly necessary that all the work be undertaken without any obligation on the hirer to make sole use of at least a minimum tonnage daily upon work requiring vehicles every day. I have several times had to grant authority for additional vehicles to ordinary "A" licences, the sole ground of justification being work for a local authority. In the absence of a contract, no other form of grant sufficed.

16. There has, however, been an appreciable increase in the number of applications for contract licences. In some cases they were from established carriers to whom traders had now, for the first time, entered into contracts handing over complete responsibility for the carriage of their goods. In others, traders had themselves previously owned and used vehicles and wished to be free from the responsibilities of the Act.

17. Reports have been made indicating that in some cases contracts have been secured through the quotation of rates which it would appear could only be remunerative if low rates of wages were paid, unduly long hours were worked by the driver or some other irregularity was being practised. I take such steps as are open to me to investigate and detect such abuses, but proof is hard to come by as more often than not the driver is under duress, and my scope for action limited.

18. My examiners have instructions to satisfy themselves periodically of the use being made of vehicles authorised under contract licences.

#### *"A" Licences.*

19. Exclusive of contract licences the number of applications by newcomers for "A" licences dealt with during the period under review was 55, of which eight were granted, 41 refused or withdrawn, and six are still to be decided.

20. During the first year, it was not often that one road carrier opposed the application of another. Existing carriers are now exhibiting a stronger interest in this matter and it is seldom an aspirant to an "A" licence is not strenuously opposed by other road carriers as well as by the Railway Companies.

21. The earliest "A" licences expired on the 30th September, 1936. To enable carriers to make timeous application for "renewal" licences, forms of

application were distributed in May and June. Of the 404 "A" renewal applications received before the end of September, 1936, objections were lodged to 52. The greater part of these opposed applications sought to secure licences with modification. In every such case, one or both Railway Companies, lodged objection.

*"B" Licences.*

22. I considered 284 applications from newcomers for "B" licences of which 98 were granted, 150 refused or withdrawn, and 36 have still to be decided. With the exception of a few applications from truly rural districts and the islands, all these applications were opposed.

23. A considerable number of these applications were from men in a very small way of business who were using vehicles under "C" licences. Finding that their costs were greater than they had anticipated and their vehicles were only partially occupied, they sought to make ends meet by entering the carrying trade. Another fairly common type was the "C" licence holder whose business was seasonal and who could only make use of his vehicle for his own purposes during the season. It appears to me that the need for proof is not thereby lessened in either of these classes and the applicants must be treated as newcomers. Most of these did not realise that any difficulty would be experienced in getting "B" licences and in some cases I fear genuine distress was occasioned by refusal.

24. Of the 2,225 "renewal" applications received objections were lodged in 278 cases.

25. Whilst most of these objections were directed against the modification sought, a considerable number were in opposition to the licence itself, or, alternatively aimed at securing the imposition of further restriction.

26. Applications for "renewal" without variation to which no objections were lodged were decided without recourse to a public inquiry, unless for some special reason I decided otherwise. Usually my reason for holding public inquiry into these exceptional cases was to warn the applicant that I was aware of certain irregularity or offence of which he was guilty. A similar procedure was adopted with regard to "A" renewal applications.

*"C" Licences.*

27. During the year 1,065 applications for "C" licences were received and 3,756 applications for variation of existing licences. Most of these were received during the last six months of the year.

28. The discs for "C" vehicles required under the new regulation were issued during the early summer and the need of such regulation was soon in evidence. Upwards of 2,000 were returned with intimation that the vehicles to which they related had been changed, scrapped or otherwise disposed of. Many carriers it seems had removed leaving no address. It was clear that there existed a very widespread state of indifference or ignorance on the part of private carriers as to the requirements of the Act and Regulations.

29. If there ever was any doubt as to the need for "C" licence holders to display discs, it should now be removed.

30. Reports and information I have received indicate that there is a tendency to increase the use of vehicles under "C" licences because the wages conditions applicable to "A" and "B" vehicles are not present. Apart from this being undesirable in itself, it tends to deprive "A" and "B" carriers of work hitherto performed by them.

31. In only four instances were holders of "C" licences authorised (under Section 2 (4) of the Act) to carry goods for persons whose needs could not be met from other sources. All these cases arose in connection with the carriage of Christmas mails for the Post Office.

*Acquisition of Carriers' Businesses.*

32. There is an increasing number of applications to "take over" "A" and "B" licences, usually from persons who have entered into agreements to

purchase the businesses. A considerable proportion of these businesses had virtually ceased to exist or else were of such meagre dimensions that they had no value (apart from the vehicles) other than that existing in the belief and hopes of the intending purchaser. Many of these were under the impression, which was frequently shared by their legal representatives, that they had only to ask that their case be dealt with under Section II (3) (b) to have their applications granted forthwith.

33. Preliminary investigation is made in each case and nearly all are published in Part I of "A. and D." Where there is notification of an objection or any doubt as to the character of the business, the applicant is summoned to a public inquiry. There, having heard statements from the parties, I decide whether the case is such that the provisions of Section II (3) (b) could be applied. This procedure was made the ground of appeal in one case without success.

#### *Variation of Licences.*

34. The statistical table shows the numbers of variation sought from holders of "A" and "B" licences. Applications for additional vehicles and extended powers for "B" licences were strongly opposed and dealt with at public inquiries. In approximately 25 per cent. of the "objected" cases the applications were refused.

#### *Revocation of Licence.*

35. I revoked one carrier's licence during the year. The licensee was the owner of one vehicle. The brakes were so ineffective that when the vehicle stopped on a hill they failed to hold it and it ran backwards on to the pavement and killed a child. Investigations proved that the driver, who was accompanied by the carrier, had warned his employer of the danger, offering to walk up the hill to make the delivery required. The employer would not agree to this and ordered his man to drive on. At the time, the carrier's own driving licence was suspended for another offence.

#### *Appeals.*

36. One appeal was outstanding from last year. Fourteen were lodged during this year. Three were withdrawn; in three instances my decisions were upheld; four orders varying my decisions were made and in five cases the appeals have not yet been decided.

#### *Conferences and Interviews.*

37. During the year, I have had several meetings with Trade Associations and Trade Unions. My senior officers were also in constant touch with these organisations.

38. A very considerable part of the work of a section of the staff is that of dealing with callers who seek advice and help on countless matters. I think it worthy of record that a very good relationship exists between the staff and the carriers.

#### *Conciliation Board.*

39. In my first report reference was made to the fact that agreement had been reached upon the Scottish Conciliation Board fixing wage rates and working conditions. The Board have adopted a uniform rate of wages for the whole of Scotland, but this decision is subject to subsequent review.

40. The Dumfries and Galloway Road Haulage Association has withdrawn its representation from the Board and a lower scale of wages is prevalent from that agreed by the Board in the Counties of Dumfries, Kirkcudbright and Wigtown.

41. In the industrial districts where the industry is comparatively well organised, the more reputable carriers are loyally adhering to the decisions of the Board, but it is known that they are being penalized by so doing by loss of traffic to less scrupulous competitors.

42. Up to the present only six representations have been made to me by the Transport and General Workers Union as to wages paid by certain carriers in the Dumfries district. These were duly passed to the Conciliation Officer, but I understand no settlement has yet been reached.

43. Meanwhile no direct action has been possible by me to deal with the licences of carriers said to be acting contrary to the "fair wages" conditions as no cases have been taken to the Industrial Court, and, consequently, no proof exists.

#### *Examination of Vehicles.*

44. During the year approximately one-third of the total licensed vehicles in this Area were examined by Vehicle Examiners. 11,788 examinations were made on 9,860 vehicles resulting in 1,478 prohibition notices being issued. In 531 cases the notices were for immediate prohibition and in the remaining 947 cases delay-action notices were issued.

45. The defects which were mainly responsible for the issue of prohibition notices were as follows:—848 Handbrake Mechanism; 717 Footbrake Mechanism; 675 Front Axle and Springs; 604 Steering Mechanism.

46. A close co-operation with the police enables examiners to get useful information concerning carriers whose maintenance is poor. Examinations are chiefly made of vehicles which are "suspected" and this procedure results in a comparatively high percentage of prohibitions being issued in proportion to the number of vehicles examined.

47. I am satisfied that the standard of maintenance continues to improve, and this opinion is confirmed by the fact that during the year under review, 1,035 (successful) prosecutions were recorded in this Area under the Construction and Use Regulations as compared with 1,819 in my first Report. Quite a number of carriers who previously had no proper maintenance system now have their vehicles periodically examined and overhauled. I find it effective to draw the attention at public inquiries of carriers requiring such advice to the fact that it is a condition of their licence that they maintain their vehicles in a satisfactory condition and that they must not wait until defects are pointed out by examiners.

48. In no case where an examiner had refused to remove a prohibition was an appeal made to the Certifying Officer.

49. The police reported 18 cases of accidents which were due to mechanical defects of carriers vehicles and also a number of cases in which vehicles were found to be mechanically defective. These reports were followed up by investigation and appropriate action.

50. My examiners reported that 'C' vehicles were not so well maintained as 'A' and 'B' vehicles.

51. The resentment frequently shown by carriers to visits made by examiners is not now such a usual experience. The carrier whose maintenance is habitually bad, as a rule, shows the strongest resentment.

52. In many districts periodic checks are arranged, being undertaken jointly by the police and examiners. Police co-operation in such matters is always very effective.

53. During the year a carrier reported that one of his drivers had been approached by a person claiming to be a vehicle examiner. Instructions to take his vehicle off the road and to have several repairs executed were carried out. My examiner was then asked by the carrier to inspect the vehicle and clear it for work. It then transpired the instructions had been given by a self-appointed examiner having no authority. The police traced this over-zealous individual and he was duly punished by having to pay a fine. No motive could be discovered. His usual occupation is that of a cinema attendant.

#### *Records.*

54. My examiners report a large number of cases of failure to comply with the requirements for the keeping of records. Failure to keep records can very often be attributed to sheer negligence or forgetfulness on the part of drivers.

While I am reluctant to institute proceedings in cases due to forgetfulness, it is very hard to distinguish between these and others in which there is an ulterior purpose.

55. It is appropriate that I mention that in some parts of my Area an impression existed that it was unnecessary for a driver to write up his record until the close of his day's work. Recent Court decisions on this particular point in the districts concerned and the publicity they received should now have made the matter clear.

56. It is to be feared that some carriers do not appreciate that they have not discharged their obligations under Section 16 by issuing forms to their drivers. Some have not even taken the trouble to see that the forms are returned, others neglect to get them back within the prescribed period, while others would appear to have stored incomplete records without inspecting them. Cases have been reported of the use of the wrong type of form.

57. Since it has now been well established in the Courts that entries in records may form prima facie evidence of offences alleged under Section 16 of the Act and also under Section 19 of the 1930 Act, it is difficult to understand why licence holders fail to exercise more care and a proper check.

58. One or two owner-drivers who were discovered without records pleaded that they understood they were entitled to claim exemption.

59. I have not felt justified in granting any of the (few) applications for dispensation which I have received during the year. I am satisfied that there are very few cases where dispensation is necessary.

#### *Irregular Practices and Prosecutions.*

60. In my first Report I stated that with a year's experience of the working of the Act behind me I would no longer assume that breaches of the provisions of the Act or of the Regulations had been committed in ignorance or through inexperience and that in future offences would be dealt with more severely. My examining officers and office staff have, accordingly, put forward a large number of cases for prosecution which in the preceding year would have been dealt with by means of a caution. The police authorities, with whom my staff are in close liaison, proceed on similar lines in cases which they themselves detect.

61. It will be seen from the analysed statement of convictions obtained under the various sections which appears later in this Report, that the commonest types of offences were in respect of drivers' records and vehicle maintenance.

62. The number of convictions of persons found guilty of operating without carrier's licence will be seen to be considerable. The majority of these were persons who should have obtained "C" licences and they were undoubtedly facilitated because of the absence of any requirement to exhibit a "disc." I anticipate a large reduction in the number of prosecutions under Section 1 (1) of the Act.

63. Contraventions of special restrictive conditions attached to "B" licences have not been numerous, and there is no reason to believe that any large scale evasions are taking place. There have been several requests from "B" licence holders for permission to undertake particular pieces of work outside the normal scope of their licence conditions. Such requests were not granted. Many were in respect of long distance journeys, and although they were usually said to be in the nature of an obligation for regular customers, I am confident that they represented exactly the type of service which should be performed either by operators holding "A" licences or by the Railway Companies.

64. My greatest concern has been reports and complaints which are still accumulating regarding the employment of drivers for excessive hours. Examination of the records of the operators affected generally reveal no irregularities.

65. The number of examiners has recently been increased and I look forward to more success in the endeavour to secure enforcement. With this increase it is now necessary to establish a separate department in the office which will have allotted a special clerical staff. It will work in close co-operation with the police and the enforcement staffs of other Areas.

66. Special attention is to be given to the type of case where the man himself willingly drives for illegally long periods for additional pay and to those where drivers falsify their records at the instance of their employers.

67. Excessive hours were thought to be particularly prevalent among long distance night drivers and during a recent 48 hours continuous check at Abington this was proved to be the case. Driver after driver informed the officers making the check that they had tried to secure accommodation at their usual road-houses, but found these to be crowded out with men who did not normally frequent them, and it is certain that many of these had had word of the check and so decided to put up for the night.

68. The full results of this check, which was carried out by police, vehicle and traffic examiners are not yet available. Many prosecutions in respect of drivers' hours, records, "B" conditions, and driving without heavy goods driving licences are being initiated. During the check 787 vehicles passed through the control point. Eleven vehicles were so defective that immediate stop notices were issued and deferred stop notices were placed upon fifty.

69. The check was carried out without causing much delay to the vehicles. The average for each vehicle being less than ten minutes. It is my intention to arrange further checks on similar lines, and I have no doubt that the assistance of the police, which was willingly given on this occasion, will again be obtainable on mutually convenient occasions. For some time I have also had a working arrangement with the police in many districts for carrying out checks on a smaller scale in collaboration with traffic and vehicle examiners.

70. The following convictions for offences under the Acts and Regulations were recorded:—

	<i>No. of persons convicted.</i>
<i>Road and Rail Traffic Act, 1933.</i>	
1. Section 1.—(1) Using an unauthorised vehicle for the carriage of goods ... ..	171
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7. Section 17.—(10) Use of a goods vehicle while under prohibition ... ..	27
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<i>Road Traffic Act, 1934.</i>	
12. Section 31.—(1) ... ..	89
13. Contraventions of Heavy Goods Vehicles (Drivers' Licences) Regulations dated 4th February, 1935 ... ..	8
14. Motor Vehicles (Construction and Use) Regulations, dated 10/1/31 and amendment thereto ... ..	1,035

*Heavy Goods Vehicles Drivers' Licences.*

71. The bulk of the initial licensing of heavy goods vehicle drivers was effected during the period covered by the previous report when, between 1st April, 1935 and 30th September, 1935, 8,528 licences were issued. During the year now under review the corresponding number was 3,194, of which the renewals totalled 507.

72. An analysis of the applications dealt with is given below:—

Applications brought forward from 1934-35 ... ..	145
Applications since received ... ..	3,435
Applications granted and licences issued ... ..	3,194
Applications refused ... ..	89
Applications withdrawn or lapsed ... ..	188
Applications awaiting decision (driving tests, etc.) ... ..	109

73. The total number of drivers licensed in the Southern Scotland Area at 30th September, 1936, was approximately 11,150.

74. Despite the considerable fall in the number of applications for licences, the decrease was not reflected in the work of vehicle examiners as regards driving tests. The dispensation granted under Section 31, Sub-section (6) of the Road Traffic Act, 1934, was in most instances taken advantage of prior to 1st October, 1935, and, therefore, the proportion of applicants requiring tests has increased to a great extent.

75. The figures relating to driving tests by examiners are as follows:—

*Vehicle Examiners.*

Tests carried out ... ..	1,264
Passed at first test ... ..	1,044
Failed first test: passed subsequent test ... ..	69
Awaiting further test ... ..	7
Failed entirely and licence refused:—	
First test ... ..	29
Subsequent test ... ..	23

76. In addition to the above figures, there were 70 applicants tested by other authorised persons. Ten of that number failed.

77. It is significant that convictions against heavy goods vehicle drivers for motoring offences, as disclosed in application forms or reported by the police are more numerous (pro rata) than in the case of public service vehicle drivers. Convictions for exceeding the speed limit are particularly prominent.

78. Two licences have been revoked consequent upon convictions under Section 15 of the Road Traffic Act, 1930. No appeals have been made against my action in refusing or revoking licences.

*Conclusion.*

79. In terminating my report I wish to record my appreciation of the very real assistance rendered by the Police Authorities in the Area in connection with the enforcement of the provisions of the Act and Regulations and also to express my sincere appreciation of the services rendered by the office and technical staffs.

I have the honour to be, Sir,

Your obedient Servant,

A. HENDERSON,  
Licensing Authority.



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*NOTE.—Letters are inserted to show the reports in which the references occur.*

A.—Northern; B.—Yorkshire; C.—North-Western; D.—West Midland; E.—East Midland;  
F.—Eastern; G.—South Wales; H.—Western; K.—South-Eastern; N.—Metropolitan;  
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ROAD AND RAIL TRAFFIC ACT, 1933

THIRD ANNUAL REPORTS  
OF THE  
LICENSING AUTHORITIES  
1936-1937

(Covering the period 1st October, 1936, to  
30th September, 1937)

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## FOREWORD

This volume contains the Reports of the Licensing Authorities appointed under the Road and Rail Traffic Act, 1933, for their third year of office from 1st October, 1936 to 30th September, 1937.

During the year the consideration of applications for "A" Licences for the second currency period in continuation of existing licences was in most cases completed; the "B" Licences issued were generally for a third currency period; and the first issue of "C" Licences in 1934 expired during the year.

During the period under review the Licensing Authorities' Enforcement Staffs were increased with a view to securing better observance of the statutory conditions attached to all licences.

The keeping of records still leaves much to be desired. An improvement in the standard of vehicle maintenance is noted by some Licensing Authorities.

Regulations under the Road Traffic (Driving Licences) Act, 1936, authorising the issue of Provisional Licences to applicants for licences to drive heavy goods vehicles came into operation on 1st January, 1937.

The Report of the Committee of Inquiry into the wages and conditions of employment of drivers of goods vehicles under the chairmanship of Sir James Baillie, O.B.E., J.P., LL.D., D.Phil., was presented in April, 1937, and the King's Speech at the opening of the present session foreshadowed the introduction of a Bill dealing with the question of wages in the industry.

The Transport Advisory Council presented a Report on Service and Rates to the Minister of Transport in July, 1937, and the Minister has intimated his acceptance of the broad principles of the Report, and his intention, after consulting interested organisations, to introduce legislation in due course.

Statistical information as to goods vehicles authorised under Carriers' Licences at 30th June, 1937, is contained in the Appendix to the Reports.

Tables I to VI relate to goods vehicles which were at 30th June, 1937, authorised under Carriers' Licences issued by the Traffic Area Licensing Authorities, and give comparative figures as at 30th April, 1936.

The total number of licence holders has increased from 215,368 to 237,601, but these figures contain a small unascertained element of duplication in respect of persons holding licences in two or more traffic areas. In the following table persons holding more than one type of licence are counted more than once.

Type of Licence.*	Number of holders.		Increase or Decrease.
	At 30th June, 1937.	At 30th April, 1936.	
"A" ... ..	23,750	25,648	-- 1,898
"A" Contract ... ..	3,267	2,084	+ 1,183
"B" ... ..	34,061	34,100	-- 39
"C" ... ..	186,481	161,221	+ 25,260
Total ... ..	247,559	223,053	+ 24,506

\* In all the cases (except "A" Contract) the figures include both currency period and short term licences.

There are marked increases in the numbers of holders of "A" contract and of "C" Licences (Table I).

The requirement that as from 1st October, 1936, all vehicles authorised under "C" Licences should display a vehicle identity certificate caused an influx of applications for "C" Licences, which indicated that the total of 161,221 "C" Licensees at 30th April, 1936, did not fully represent the number of operators using motor vehicles which required to be authorised under "C" Licences. Many persons holding "C" Licences which expired at 30th June, 1937, had ceased to operate during the currency of their licences, and failed to notify the Licensing Authorities; to this extent the number of "C" Licence operators at 30th June, 1937, is inflated.

The total number of Motor Vehicles Authorised and in Possession was:—

Licences.*	At 30th June, 1937.	At 30th April, 1936.	Increase or Decrease.
" A " ... ..	83,626	85,337	— 1,711
" A " Contract ... ..	7,475	5,156	+ 2,319
" B " ... ..	53,775	52,809	+ 966
" C " ... ..	362,380	316,714	+ 45,666
Total ... ..	507,256	460,016	+ 47,240

The motor vehicles at 30th June, 1937, authorised on " C " Licences represented 71 per cent. of the total number of motor vehicles authorised on all types of licences.

The railway companies owned 11 per cent. of motor vehicles authorised on " A " Licences (including contract licences). The following table shows the distribution of the 507,256 vehicles at 30th June, 1937, as between railway and other ownership:—

Licences.*	Vehicles.	
	Railway Ownership.	Other Ownership.
" A " ... ..	9,615	74,011
" A " Contract ... ..	19	7,456
" B " ... ..	—	53,775
" C " ... ..	75	362,305
Total ... ..	9,709	497,547
	507,256	

\* In all cases (except " A " Contract) the figures include both currency period and short term licences.

Among operators other than railway companies the average number of vehicles authorised and in possession was:—

for each holder of:—

" A " Licences—3·1 " A " vehicles and 3·6 vehicles of all classes.

" B " Licences—1·6 " B " vehicles and 2·3 vehicles of all classes.

under each:—

" A " Licence—3·07 vehicles (as against 2·95 in 1936).

" A " Contract licence—1·69 vehicles (as against 1·81 in 1936).

" B " Licence—1·55 vehicles (as against 1·54 in 1936).

" C " Licence—1·94 vehicles (as against 1·96 in 1936).

Of " A " Licence holders 52 per cent. (12,335) had only one vehicle on their " A " Licence; 86 per cent. (20,412) had less than five.

Of " B " Licence holders 74 per cent. (25,263) had only one vehicle on their " B " Licence; 97 per cent. (32,901) had less than five.

Tables VII (a), (b), (c) and VIII give in summary form an indication of the extent to which " B " Licence operators undertake road haulage for hire or reward and the nature of the businesses (other than haulage) carried on by them.

Of 34,061 " B " licensees, 13,682 are colliery proprietors, coal, coke, and peat merchants and agents; 2,692 builders, builders' merchants, and public works contractors, plumbers, decorators, and gas fitters, etc.; 2,205 farmers, dairymen, and live stock dealers (including poultry farmers).

There were 76,398 special conditions on "B" Licences at 30th June, 1937; of these 55,828 permitted the conveyance of goods, either general goods or named goods, within zones not exceeding 100 miles:—

Not exceeding	10 miles	...	...	...	13,290	conditions.
"	20 "	...	...	...	17,464	"
"	30 "	...	...	...	12,061	"
"	50 "	...	...	...	9,488	"
"	100 "	...	...	...	3,525	"
					<u>55,828</u>	"

..

In 3,587 cases, operators were allowed to carry either 100 miles or over, or for unlimited distances.

## NORTHERN TRAFFIC AREA

To the Minister of Transport.

SIR,

### *Road and Rail Traffic Act, 1933.*

In pursuance of the provisions of Section 23 (4) of the Road and Rail Traffic Act, 1933, I have the honour to submit my third Annual Report, for the period ended the 30th September, 1937.

#### *1. Features of the Year's Work.*

This third year of my administration of the Act in the Northern Traffic Area has in the main been devoid of any outstanding development in the industry of goods carrying by road. It has rather been a period during which I have sought to maintain the balance as between road and rail interests, for which I strove during the first two years of my work, and to impress upon operators their duties and obligations under the provisions of the statute and the conditions attached to carriers' licences. This aspect of the work is referred to in greater detail in the later stages of this report.

As regards the licensing of goods vehicles, the period under review has shown a marked trade revival in certain industries in the Area. The comparative statement appended below shows the position with regard to full currency period licences in force, and vehicles authorised under those licences at the close of the period on the 30th September, 1937, compared with the position for the two preceding years. This short summary is set out at the beginning of the report in order to give at a glance a bird's-eye view of the present position as compared with that of the two previous years.

It will be noted, from a comparison with last year's figures, that, notwithstanding the revival in trade, the position with regard to Public "A" and Limited "B" Carriers' Licences (and the total number of vehicles authorised under those licences) remains almost static. This I consider is a clear indication that, so far as the carrying of goods for hire or reward is concerned, the general increase in trade has been dealt with without any substantial increase in the aggregate facilities which were available before the year began. During the year authority has been given for the acquisition of a number of additional vehicles under Public "A" and Limited "B" Carriers' Licences, but these on the other hand have been offset by licence holders (small operators in most cases) who have, during the period, surrendered their licences or allowed them to lapse.

(1) Class of Licence.	(2) Current No. of Licences 1.10.1935.	(3) No. of vehicles authorised 1.10.1935.	(4) Current No. of Licences 1.10.1936.	(5) No. of vehicles authorised 1.10.1936.	(6) Current No. of Licences 30.9.1937.	(7) No. of vehicles authorised 30.9.1937.
"A" ... ..	1,487	4,547	1,448	4,668	1,409	4,689
"A" Contract	64	95	149	198	267	353
"B" ... ..	1,565	2,284	1,540	2,266	1,546	2,274
"C" ... ..	6,539	12,782	7,617	14,049	7,954	14,819
Total ...	9,655	19,708	10,754	21,181	11,176	22,135

I indicated in my last Annual Report that the large increase in Private "C" Carriers' Licences probably indicated a tendency on the part of traders to provide their own motor transport for the carriage of their own goods, in preference to rail and other forms of transport. The above figures would appear to indicate that this tendency still exists as the number of vehicles authorised under Private "C" Carriers' Licences continues to increase. Indeed as between the 30th September, 1935, and the 30th September, 1937, the increase in vehicles authorised under Private "C" Carriers' Licences is no less than 2,037, or 15 per

cent. It should be remembered, however, that as was pointed out in my last Annual Report part of this increase was due to the number of applications received immediately following the issue of identity certificates under the terms of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936. The number of carriers' licences which during the year have been surrendered, or have lapsed, is as follows:—

" A " Licences ... ..	122
" B " Licences ... ..	161
" C " Licences ... ..	1,071

The number of Private " C " Carriers' Licences which have been surrendered or have lapsed is exceedingly heavy. This is probably largely accounted for through the whole of the licences granted at the inception of the licensing provisions of the Act, on the 1st July, 1934, having expired. The work of renewing these licences has recently occupied a considerable amount of the time of my staff, and the completion of this work brought to light a large number of cases in which application for renewal of the licence had not been made. These cases are included in the figure quoted above, and it is possible that many of the licences ceased to be required at various dates throughout the currency period of three years. The fact that these have just come to light is due to failure on the part of many licence holders to return their licences to me for cancellation in accordance with the requirements of Regulation 21 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936.

During the period covered by this report I have again completed the task of reviewing for a further year the entire block of Limited " B " Carriers' Licences. A substantial proportion of the Public " A " Carriers' Licences have also expired during this time after a two years' period of validity, and the renewal of approximately 1,000 of these has also been undertaken.

The two following tables show the applications for licences and variations received and the manner in which they were dealt with during the period under review:—

Table I.—Applications for Carriers' Licences.

Nature of application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
" A " Licences:—					
Currency Period ... ..	33	1,124	28	1,096	27
Short Term, Section 3 (3) ...	1	37	4	32	—
Contract ... ..	1	201	2	193	—
" B " Licences:—					
Currency Period ... ..	72	1,646	49	1,588	40
Short Term, Section 3 (3) ...	1	46	3	40	—
" C " Licences:—					
Currency Period ... ..	8	4,928	8	4,920	—
Short Term, Section 3 (3) ...	1	42	—	43	—

	" A "	" B "	" C "
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..	2	—	21
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	21	27	—
Short Term Administrative Licences issued (Section 3 (4)) ... ..	1	—	—
Short term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ...	19	12	—



Table II.—Applications for Variation of Carriers' Licences.

Nature of variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles.					
A Licences :—					
Published and dealt with at Inquiry ... ..	} 51	} 1,310	24	86	18
Published but determined without Inquiry ... ..			8	23	—
Not published ... ..			51	1,109	—
B Licences :—					
Published and dealt with at Inquiry ... ..	} 27	} 725	8	53	14
Published but determined without Inquiry ... ..			3	14	—
Not published ... ..			22	609	—
Variations of Conditions attached to B Licences. ... ..	4	52	9	39	5

## Section 11 (3) (b) of the Act.

Included in Table I above are certain applications for licences to expire not later than existing licences under which the authorised vehicles were required to be used in connection with businesses which the applicants had acquired or intended to acquire. In the earlier period of my administration, applications of this type were generally examined by me and granted without publication in Part I of "Applications and Decisions," and without reference to a Public Inquiry. For some time past my examination of these applications has given rise to apprehension regarding the genuineness of many of them, and, notwithstanding that I am not obliged by the Statute to publish them, I have felt that in certain cases the only adequate means of conducting a thorough investigation would be effected by resorting to this course, and by listing these for a Public Inquiry. During the period under review the number of applications dealt with in this class was as follows:—

	" A "	" B "
(a) Dealt with and granted without publication ...	21	27
(b) Published in "Applications and Decisions" and listed for hearing at a Public Inquiry ... ..	34	17

Of the above, 30 applications involved the absorption of carriers by existing licence holders.

## 2. Advice to Carriers.

Notwithstanding the lapse of time since the inception of the Act, many operators (particularly small operators) continue to find difficulty in understanding and complying with its requirements. During the past year no fewer than 6,557 persons visited my office seeking guidance and assistance in regard to the completion of their applications, their statutory obligations, and so on.

## 3. "Applications and Decisions."

During the year under review 39 issues of "Applications and Decisions" have been published.

#### 4. Public Inquiries.

In order to consider and determine applications for Public "A" and Limited "B" Carriers' Licences and variations thereof published in "Applications and Decisions," I have held 76 Public Inquiries, as compared with 67 in the previous year, at the following towns:—

Newcastle (36), Carlisle (13), Darlington (9), Durham (3), Stockton (3), Berwick (1), Bishop Auckland (1), Cockermouth (1), Hexham (1), Kendal (1), Keswick (1), Morpeth (1), Northallerton (1), South Shields (1), Sunderland (1), West Hartlepool (1), and Whitehaven (1).

The total number of applications heard at these Inquiries was 1,584, the average number per sitting being 20.8. This average is lower than that of the previous year (which was 26.2) owing to the increasing opposition of objectors and the consequent prolongation of the proceedings. During the year I had to adjourn 223 applications for the production of further evidence, and in addition to this I took 107 applications to *avizandum*. In only two instances during the year was I required to furnish an applicant with "reasons in writing" in accordance with Section 6 (3) of the Act. It has, however, been my practice after considering applications of a contentious nature to prepare and announce written decisions in which the main issues involved have been dealt with and the reason for my decision given. I have announced written decisions in 80 cases during the period covered by this report.

#### 5. Objections.

Objections received during the year numbered in all 1,836 as compared with 2,034 in the previous year. They were distributed as follows:

	<i>Source of Objection.</i>	<i>Percentage of total.</i>
London and North Eastern Railway Company ...	1,139	62.0
London Midland and Scottish Railway Company	121	6.6
Associated Road Operators, Ltd., Members of ...	446	24.3
Shipping Companies ... ..	45	2.5
Other Road Operators ... ..	85	4.6
	1,836	100.0

Fifty-eight objections were withdrawn prior to the holding of the relative Public Inquiries. Applications which were the subject of one or more objections are distributed as follows:—

Class of Application.	No. of Applications.	No. of Applications objected to.	Percentage of objected applications.
"A" New ... ..	43	36	83.7
"A" Section II (3) (b) ... ..	34	29	85.3
"B" New ... ..	149	130	87.2
"B" Section II (3) (b) ... ..	17	13	76.4
"A" Renewal (Modified) ... ..	94	78	82.9
"A" Renewal (Without modification) ... ..	923	156	16.9
"B" Renewal (Modified) ... ..	161	133	82.6
"B" Renewal (Without modification) ... ..	1,274	463	36.3
"A" Variations:—			
(1) Additional Vehicles ... ..	93	82	88.1
(2) Substitutions ... ..	60	51	85.0
"B" Variations:—			
(1) Additional Vehicles ... ..	61	53	86.8
(2) Substitutions ... ..	30	23	76.6
(3) Conditions ... ..	40	33	82.5

The percentage of renewal applications without modification which were the subject of objection shows definite signs of decreasing and was dropping still more rapidly at the time of the preparation of this report. The great majority of applications for variation are in respect of "substitutions" not involving any

considerable increase in tonnage. These have in the main been granted by me without publication in "Applications and Decisions" and without being laid open to objection.

#### 6. *Revocation or Suspension of Carriers' Licences.*

I have not revoked or suspended a carrier's licence under Section 13 of the Act. During the course of the year, however, it has been necessary for me to hold a Public Inquiry in connection with one operator, in order to ascertain whether or not vehicles authorised under his Public "A" and Limited "B" Carriers' Licences should not be removed therefrom in pursuance of Section 10 (3) of the Act. This Inquiry occupied one day and as a result I removed one vehicle from the Public "A" Carrier's Licence, and one vehicle from the Limited "B" Carrier's Licence.

#### 7. *Appeals.*

During the year nine appeals against my decision were lodged with the Appeal Tribunal, as follows:—

Nature of Appeal.	Decisions.			
	Allowed.	Disallowed.	Abandoned.	Awaiting Hearing.
Against Refusal to grant a Licence ... ..	—	2	1	1
Against Refusal to vary a Licence (excluding "B" conditions) ... ..	—	1	—	—
Against Grant of Licence ... ..	—	—	—	2
Against Grant of variations (excluding "B" conditions) ... ..	—	—	1	1
	—	3	2	4

#### 8. *Temporary Licences.*

The undernoted licences have been granted under Regulation 15 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936:—

Contract "A" ... ..	2
Public "A" ... ..	17
Limited "B" ... ..	12

#### 9. *Emergency Services.*

Authority was granted under Section 2 (4) of the Act in six instances for the holders of Private "C" Carriers' Licences to provide services for the carriage of goods for hire or reward. In each case this authority was restricted to the carriage of Christmas mails for local Postmasters.

#### 10. *Keeping of Records.*

Five applications were received under Section 16 of the Act for dispensation from the keeping of records on the grounds that it was not practicable for the requirements of the Goods Vehicles (Keeping of Records) Regulations to be observed; three were refused and two partial dispensations were granted. These were simply renewals of applications previously granted.

#### 11. *Contract "A" Licences.* (Section 7 (1) of the Act.)

During the last year contracts in support of applications for Contract "A" Licences have been produced to an increasing extent. This is particularly so in regard to certain local authorities who require the services of hauliers for the carriage of goods in connection with the construction of roads, housing estates, etc.

The necessity for controlling the activities of holders of Contract "A" Licences is urgent, and an amendment of the legislation conferring discretion

upon the Licensing Authority to grant such licences only on evidence of need, would, I am sure, be much appreciated by those members of the industry who are anxious for the maintenance of competition on an economic basis, and would also assist in the general scheme of control and co-ordination which is envisaged in the Statute.

12. *Inspection of Goods Vehicles.*

The examination of goods vehicles during the last 12 months has not only thrown much light on their general condition but has also shown an upward tendency in maintenance. Of the 6,485 vehicles examined, 2,135 were found defective, and prohibitions were issued; of this number 447 were immediate. The clearance of these and other prohibitions involved a further 2,672 vehicle examinations, making a grand total of 9,157 for the year.

Apart from the normal routine examinations made by Examiners, six controlled checks were made at different points in the Area, during which 1,634 vehicles were examined. As a result 480 delayed prohibitions and 43 immediate prohibitions were issued. The following analysis shows the main defects found on all vehicles examined during the year, as compared with the defects found on the vehicles examined during the controlled checks.

	<i>Total.</i>	<i>Controlled Checks.</i>
Vehicles examined ... ..	6,485	1,634
Vehicles Prohibited—Immediate ... ..	447	43
Vehicles Prohibited—Delayed ... ..	1,688	480
Vehicles Prohibited—Total ... ..	2,135	523
Defects on steering connections, swivel axles, etc.	2,627	535
Front axle beams ... ..	88	2
Springs and anchors, radius rods, shackles, pins, etc. ... ..	1,423	392
Foot and hand brakes and mechanism ... ..	1,139	180
Road wheels, studs, etc. ... ..	366	73
Chassis frames, cross members, sub frames and brackets ... ..	321	79
Rear axle and differential casing ... ..	101	21
Engine, gear box, propeller shafts, universal joints	233	44
Exhaust systems ... ..	147	31
Petrol systems ... ..	67	14
Mudwings and body ... ..	979	201
Water ... ..	48	—
Other defects ... ..	1,036	249

It has been particularly noticeable that long distance vehicles of the heavy type are generally well maintained. The long distance vehicles of the lighter type, that is those below 2½ tons unladen, take second place. Those operated locally have a lower standard of maintenance, and of these, the "C" class vehicles are generally maintained in an unsatisfactory condition. Locally operated vehicles are not easily brought into the net during controlled checks, as the news quickly spreads and local operators avoid the routes under control. This has been proved by observation at other points and by moving a part of the check to an alternative route.

*Overloading.*

The Construction and Use Regulations govern the rear overhang of a vehicle but not the rear overhang of the load. A vehicle with a very high tail-board complies with the Regulations when the latter is up but when down and carrying a load it rarely complies. During the period when observations have been kept, several cases have been noted where the rear overhang, owing either to the unsuitability of the vehicle to carry the type of load or to the bad distribution thereof, has caused little or no weight to be placed on the front wheels. When such vehicles are being driven at ordinary speeds there is a tendency for the front wheels to bounce along the road and thus render the vehicle incapable of being properly controlled. In fact, in one instance a Vehicle

Examiner was able to raise the front wheels of a vehicle entirely clear of the ground by lifting the front bumper. This unsatisfactory feature is found mostly on short-wheel base vehicles in the motor car class.

#### *Trailers.*

Trailers which are connected to the towing vehicle, and the efficiency of their brakes, are matters that require constant attention. Many instances have been observed where the pin connecting the trailer has not been properly secured, also the brake coupling between the two vehicles has been found to be in a large number of cases unsatisfactory.

There has been a big increase in the number of trailers drawn by private cars. There is no means of determining the number, but many tradesmen, especially builders and farmers, are using these vehicles for sales and delivery.

#### *Showmen's Vehicles.*

The examination of showmen's vehicles has always been difficult owing to their moving from place to place during the spring and summer months; it is difficult to trace them and follow them up. Even when a prohibition is imposed it is not an easy matter to get it cleared. During the greater part of the autumn and winter the vehicles are laid up on private ground and in many cases cannot be inspected for this reason. This class of vehicle presents a problem, inasmuch as they are mostly vehicles that have had their useful life either as public service vehicles, or as goods vehicles. The average age is very high, and although such vehicles do not travel a great aggregate mileage during the year, the need for maintenance is important, as the general standard of the vehicles is low.

#### *Accidents.*

The examination of vehicles that have been involved in accidents, with a view to determining whether their condition was in any way a contributory cause, is most important. During the year 92 accidents were investigated but owing to absence of information in many cases, and delay in others, it was rarely possible to obtain full value from the vehicle examination, and the importance of receiving information as soon as possible after the accident has occurred is again stressed. Instances have also come to notice where certain vital parts have been removed from vehicles involved in accidents before the Examiners were able to see the vehicles.

#### *Speeding.*

Observations were made over a period of two weeks by some of my officers during the course of their duties, and a number of cases of speeding were observed. In consequence I made a public announcement calling the attention of licence holders to the fact that it is one of the conditions under which a carrier's licence is granted that the requirements with respect to limits of speed shall be observed; I also warned drivers against speeding. It has particularly been observed that the drivers of tradesmen's light vans incline to exceed the speed of 30 miles per hour to which these vehicles are restricted.

#### *Spare Parts.*

During recent months a number of operators have made the excuse that their failure to complete necessary repairs was due to difficulty in obtaining spare parts, their plea being that there was a shortage owing to the armament programme.

### 13. *Enforcement of the Provisions of the Act.*

I stated in my last report that certain increases of staff had taken place in the Enforcement Section of my office, and I indicated that when these officers became familiar with the requirements of their duties the full benefit of their service would be felt. This is fully borne out by the number of offences that have been detected and dealt with. From the large number of reports I have received from the Police Authorities and from my Traffic Examiners, and also from the public and organisations representative of those engaged in the road

transport industry, I am satisfied that there is still a widespread tendency to ignore the requirements of the law, and that the enforcement of certain provisions of the Acts requires sustained and energetic effort.

The 34 summonses for various types of offences noted in my last report as remaining to be dealt with by the Courts have all since been disposed of, resulting in convictions being recorded in 33 cases; the remaining case was dismissed.

During the current year 1,275 summonses were issued by me or by the Police in co-operation with me, and fines and costs totalling £992 14s. were imposed. The offences referred to and the manner in which they were disposed of are shown in the following statement:—

Class of Offence.		Charges.	Con- victions.	Dis- missed.	With- drawn.	Out- standing.
<b>Road Traffic Act, 1930:—</b>						
Section 4 (1)...	Driving, or employing a person to drive, a motor vehicle when not licensed to do so.	2	2	—	—	—
Section 19 ...	Driving or permitting a person to drive, for periods longer than those prescribed in the Act.	111	93	14	—	4
Section 112 (2)	Knowingly making a false statement for the purpose of obtaining the grant of a licence.	5	3	—	—	2
<b>Road and Rail Traffic Act, 1933:—</b>						
Section 1 ...	Using a goods vehicle without the authority of a carrier's licence.	95	86	1	5	3
Section 8 (1) (a)	Failing to comply with a condition of carrier's licence in that the authorised vehicle was not maintained in a fit and serviceable condition.	44	35	—	—	9
Section 8 (1) (c)	Failing to comply with a condition of carrier's licence in that the statutory obligations regarding hours of drivers were not observed.	109	95	14	—	—
Section 8 (1) (d)	Failing to comply with a condition of carrier's licence in that the statutory provisions relating to the keeping of records were not complied with.	149	121	12	2	14
Section 9 (1)...	Failing to comply with condition of carrier's licence (excluding those referred to in connection with Section 8 (1) (a), (c) and (d) above).	24	18	5	1	—
Section 16 and Regulations made thereunder.	Failing to keep, carry, preserve, produce, or cause to be kept drivers' records	652	591	16	3	42
Section 17 (10)	Using a goods vehicle while a prohibition was in force.	4	4	—	—	—
Section 34 (1)	Displaying Identity Certificate with intent to deceive.	1	1	—	—	—
<b>Road Traffic Act, 1934:—</b>						
Section 31 (1)	Driving, or employing a person to drive, a heavy goods vehicle without a licence to do so.	24	22	—	—	2

Class of Offence.		Charges.	Con- victions.	Dis- missed.	With- drawn.	Out- standing.
Goods Vehicles (Licences and Prohibitions) Regulations, 1936:—						
Reg. 12 (2) ...	Failing to display identity certificate in waterproof container.	27	22	—	2	3
Reg. 17 ...	Failing to notify Licensing Authority of change of address.	1	1	—	—	—
Reg. 21 ...	Failing to notify Licensing Authority of disposal of vehicle.	3	1	—	2	—
Motor Vehicles (Construction and Use) Regulations, 1937:—						
Reg. 16 ...	Failing to have motor vehicle fitted with safety glass.	1	1	—	—	—
Reg. 67 ...	Permitting motor vehicle to be operated in a dangerous condition.	7	7	—	—	—
Reg. 68 ...	Failing to maintain braking system in efficient working order.	13	13	—	—	—
Reg. 71 ...	Failing to maintain tyres so as to be free from defect.	3	3	—	—	—
Total ...		1,275	1,119	62	15	79

In arriving at a decision in regard to the institution of proceedings, I have taken the view that the requirements of the Acts and Regulations should now be familiar to the persons engaged in the industry, and unless I have been satisfied, after carefully considering the explanations furnished, that the offences were committed in extenuating circumstances, I have issued instructions to prosecute. The 118 letters of warning that were issued made it plain that I cannot continue to take the same lenient view of some offences as I have done hitherto.

It will be noted that the number of summonses issued in connection with the use of unauthorised vehicles has shown some reduction, but having regard to the period during which the Act has been in force, the number is still high.

As in the previous year offences in respect of excessive driving hours and failure to keep, or to cause to be kept, drivers' records, account for most of the remaining prosecutions. I am still seriously concerned by the number of reports and complaints that reach me regarding the excessive number of hours worked by drivers, and I have paid special attention to the enforcement of the provisions of the Acts and Regulations that have been passed with the express purpose of contributing to the safety of the public and of drivers. The number of summonses issued in respect of breaches of these provisions was 291, of which 250 were successful, 13 remained unheard at the end of the year, and 28 were dismissed. I have included under this category the charges preferred for failing to maintain the authorised vehicle in a fit and serviceable condition; failing to comply with the condition of the licence in relation to drivers' hours; operating a vehicle while a prohibition was in force; driving or permitting a person to drive for periods longer than those prescribed; permitting a motor vehicle to be operated in a dangerous condition; failing to maintain the braking system in efficient working order; and failing to maintain tyres so as to be free from defect. The dismissed cases were practically all disposed of either because the Magistrates decided to accept the explanations by the defendants that the alleged offences were due to unavoidable delays that were not within the knowledge of the prosecution, or that the Court held they had no jurisdiction to hear the cases.

Notwithstanding that the general standard of record keeping has improved, there has been a considerable increase in the number of offences for failing to comply with the provisions of the Act and Regulations relating to the keeping of

records. It will be noted that 801 summonses have been issued in respect of offences of this category, and they account for over 60 per cent. of the total number of summonses issued. Practically all the charges have arisen through neglect to keep records, although a number of these offences have also fallen into this category for the reason that the information contained in the record was incorrect, but sufficient evidence was not available to bring the more serious charge of maintaining false records or of failing to comply with the provisions relating to drivers' hours. I decided to institute special checks on goods vehicles in order that sufficient evidence might be available to detect this type of offence.

Traffic Examiners, in co-operation with the Vehicle Examiners and the Police Authorities, carried out six general checks on goods vehicles to which reference is made elsewhere in this report, and records of drivers of 1,941 vehicles were examined. This number is inclusive of 307 south-bound vehicles, on the occasion of one of these checks, which were examined as regards records alone, and not for mechanical fitness, owing to lack of time. Eighty offences were disclosed, 63 of which were failure to keep current records, and four in respect of driving excessive hours.

On five occasions the Traffic Examiners have collaborated in checks organised by the Police Authorities for the purpose of examining road fund licences, etc., and 23 offences were detected, practically all of which were failure to keep current records. According to the circumstances of the case, all these offences were dealt with either by the institution of proceedings or the issue of warning letters.

#### 14. Licences to Drive Heavy Goods Vehicles.

The following statement shows the manner in which the 3,573 applications to be dealt with have been disposed of:—

In action or awaiting action at the 1st October, 1936 ...	293
Applications received (including applications for provisional licences) ... ..	3,280
Applications withdrawn before issue of provisional licences	12
Provisional licences granted ... ..	862
Provisional licences refused ... ..	Nil
Substantive licences granted ... ..	2,720
Substantive licences refused ... ..	35
Applications for substantive licences not proceeded with after grant of provisional licence (including those owing to failure to arrange a driving test) ... ..	505
In action or awaiting action at 30th September, 1937 ...	114

Inability for some reason or other to undergo a driving test accounted for 115 of the 505 applications not proceeded with.

By virtue of the provisions of the Road Traffic (Driving Licences) Act, 1936, and the Regulations made thereunder, I was empowered as from the 1st January, 1937, to issue provisional heavy goods vehicle drivers' licences for a currency period of three months for the purpose of enabling persons to learn to drive heavy goods vehicles. The number of applications for such provisional licences received since that date was 939, of which 862 were granted and provisional licences issued, 12 were withdrawn, and 65 were still awaiting action at the end of the year. Of the 862 holders of provisional licences, 452 succeeded in passing a driving test on a heavy goods vehicle and were granted substantive licences.

The large number of licences refused is accounted for by the fact that 115 applicants have been unable to obtain a heavy goods vehicle on which to undergo a driving test, while 35 failed in the test.

The number of applications withdrawn was 390, the majority of which were not proceeded with by persons who, although holders of provisional licences, had subsequently intimated that they did not propose to pursue their applications for substantive licences.

Of the 2,720 licences granted during the year, 1,667 were renewals of existing licences; 601 represented applications submitted by persons who were able to satisfy me that they possessed the necessary qualification to enable them to claim



a heavy goods vehicle driver's licence by virtue of the provisions of the Act, while the remainder were issued to holders of provisional licences who passed a driving test.

The 114 applications still in action were awaiting replies to requests for further information or reports upon driving tests. No appeals to Courts of Summary Jurisdiction against my decision on any of these applications have been made.

The number of tests of competence to drive heavy goods vehicles which have been conducted by my technical officers during the year, and the results thereof, are shown in the following statement:—

Number of driving tests conducted	732
Number of tests conducted where applicants passed on the first occasion	621
Number of tests conducted where applicants failed to pass the first test but passed on a subsequent occasion	76
Number of tests conducted where applicants failed entirely to pass test	35

The large percentage of applicants who failed to pass the driving test on the first occasion is probably due to the fact that there are very few holders of carriers' licences owning a large number of vehicles of the heavy goods vehicle type, and it is difficult, therefore, for applicants to secure adequate opportunities for learning to drive such vehicles.

Included in the foregoing figures are tests of 33 applicants who passed, and seven who failed to pass, dual tests with a view to obtaining both vocational and ordinary driving licences.

During the year licences were issued by me to 171 persons who were tested and passed by other approved examiners appointed by nine authorities and companies that have been authorised by the Minister of Transport to carry out driving tests of their own employees for the purpose of Section 6 of the Act, and that have received my permission to conduct tests for the purpose of Section 31 of the Act also. These tests are in addition to those conducted by my Examiners.

In two instances during the year licences have been suspended owing to the licensees having been repeatedly convicted for exceeding the authorised speed limit. One licence was suspended for three months and the other for six months. I decided in another case to revoke a licence after I had suspended it on two previous occasions.

#### 15. *Conclusion.*

The work involved in the administration of the Act during the past year is still heavy, and the diminution in objections lodged against renewal applications for Public "A" and Limited "B" Carriers' Licences has been offset by the strenuous opposition against applications for new licences, and for the variation of existing licences by the addition of further vehicles. This opposition has not by any means been confined to Railway Companies, no less than 28.9 per cent. of the total objections received having been lodged by road operators. I would pay tribute to the frankness with which applicants generally have tendered their evidence, and have provided me with the fullest information concerning their businesses. Similarly I have generally been impressed with the fairness and freedom from rancour with which the objectors have made their case. This attitude on both sides has enabled me to overtake my duties with greater expedition, and at the end of the period covered by this report there were practically no arrears outstanding.

So far as Railway objections are concerned, it is worthy of note that special opposition has been offered to the carriage of coal by road over long distances, on the ground that this is a class of traffic peculiarly suited to rail transport.

It is of interest to note that during the year under review no less than 60 applications for Public "A" and Limited "B" Carriers' Licences and variations thereof, involving in all 101 vehicles, were submitted to me in consequence of the substitution of 177 horses. The Railway Companies operating in my Area have also continued to pursue steadily their policy of horse substitution—indeed

the Railway formula of "a motor vehicle for a horse and a half" is widely quoted from end to end of the Area by road hauliers, in support of their applications for replacement of horses by motor vehicles. There are of course no known figures showing the extent to which horses have been substituted by vehicles authorised under Private "C" Carriers' Licences.

The extensive area over which offences are committed in the case of long distance journeys by motor vehicles which has given rise to questions of jurisdiction in the Courts has presented a new problem and one which has seriously hampered enforcement work. The question is, of course, one of general application, but personally I should welcome a simplification of the existing procedure with a view to the speedier disposal of cases.

It is gratifying to be able to record a general improvement in the standard of maintenance consequent upon inspections by the technical staff. Operators generally speaking have appreciated the inspection of their vehicles, and have welcomed the advice given by the Vehicle Examiners, but there is still a great need for them to realise the necessity for making their own arrangements for periodical overhauls. Notwithstanding the large number of prohibitions issued during the year no appeals for their removal have been lodged.

The recently published report of the Transport Advisory Council on the subject of "service and rates" in relation to goods traffic appears to be welcomed by the hauliers with whom I have recently come into contact. The general opinion is that the statutory regulation of rates and charges on the lines indicated in the report would materially assist in providing a solution of the problem of uneconomic competition and would be correlative with any scheme which may be adopted for the statutory regulation of wages and conditions of employment.

In terminating my report I would place on record the fact that the recognised Road Operators' Associations have been very helpful to me in the submission of evidence, and I wish also to express my indebtedness to the various local authorities and public bodies who have assisted me by placing at my disposal suitable accommodation for the holding of Public Inquiries in the various towns I have visited. The police authorities have also continued to give that cordial and helpful co-operation that meant so much to me during my first years of office as Licensing Authority.

Finally I desire to express my sincere appreciation of the services rendered by my headquarters and technical staff in assisting me in my administration of the Act during the year.

I have the honour to be,

Sir,

Your obedient Servant,

JOHN MAXWELL.

Licensing Authority.

## YORKSHIRE TRAFFIC AREA

To the Minister of Transport.

SIR,

1. As the licensing authority for the Yorkshire Traffic Area, I have the honour to present to you, in accordance with Sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933, the third annual report, which covers the 12 months ended 30th September, 1937.

2. Mr. E. Russell Gurney, LL.B., was appointed deputy licensing authority for this Area by your predecessor in office on the 5th November, 1936, in succession to Mr. Willoughby Bullock. Mr. Russell Gurney has afforded me immense relief in dealing with applications at public inquiries, and his collaboration on problems arising from the administration of the Act has also helped me considerably.

3. Tables I and II, which follow, show the number of applications of various kinds received and disposed of during the year:—

TABLE I.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ... ..	475	2,295	121	2,382	65
Short Term, Section 3 (3)...	14	78	4	71	9
Contract ... ..	45	391	12	409	9
"B" Licences :—					
Currency Period ... ..	686	3,190	135	3,314	130
Short Term, Section 3 (3)...	7	58	8	46	3
"C" Licences :—					
Currency Period ... ..	40	9,444	80	9,394	—
Short Term, Section 3 (3)...	—	52	—	52	—
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..			"A"	"B"	"C"
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..			—	—	24
Short Term Administrative Licences issued (Section 3 (4) ) ... ..			14	5	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations)...			74	102	—
			267	85	—

TABLE II.—*Applications for Variation of Carriers' Licences.*

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to vehicles					
"A" Licences :—					
Published and dealt with at Inquiry ... ..	} 233	} 2,286	45	420	104
Published but determined without Inquiry... ..			32	207	—
Not published ... ..			131	1,439	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	} 85	} 1,182	20	243	28
Published but determined without Inquiry... ..			23	208	—
Not published ... ..			48	643	—
Variations of conditions attached to "B" Licences	17	99	15	59	28

## Public "A" Carriers' Licences.

4. Details of applications for currency period licences, shown in Table I as disposed of, are as follows:—

Type of Application.	Withdrawn.	Granted.	Refused.
(i) Applications for further licences in substitution for existing licences ... ..	64	2,215	20
(ii) Applications arising from a change of legal entity	25	109	10
(iii) New applications from persons who sought to enter the industry as holders of "A" licences	32	9	35
(iv) Applications to which the provisions of section 11 (3) (b) of the Act applied ... ..	—	49 (Including the 14 applications referred to in Table I.)	—
Total ... ..	121	2,382	65

Five of the refusals under (i) above and four of the refusals under (iii) were on account of lack of prosecution of the applications.

The increase in the number of applications received as compared with the previous year is due to the fact that a large number of first licences expired during the year under review. Eighty-four per cent. of the applications submitted for further licences in continuation were published and determined without a public inquiry; the remaining 16 per cent., totalling 360 cases, were listed for public hearings because objections had been lodged, or because some particular evidence was required to enable a decision to be given. In addition, 244 of the cases falling within categories (ii), (iii) and (iv) in the above statement were dealt with at public inquiries.

During the early part of the period covered by this report, strenuous representations were made by the railway companies in a limited number of cases against the grant of licences in substitution for existing licences where a substantial part of the applicants' businesses related to long-distance haulage. The applicants concerned who were amongst the largest "A" hauliers in the Area, sought new licences in substitution for their existing licences and in certain cases asked for additional tonnage. So far as the existing authorised vehicles were concerned, the applicants set out to prove (a) that during the currency of their licences the vehicles had been regularly and fully occupied, and in support of this they gave particulars of their gross receipts and tonnage, and (b) that there had been no material change in the circumstances relating to their businesses. In regard to the additional tonnage applied for, the applications were based, inter alia, upon the following grounds:—

- (i) The difficulties experienced in undertaking collection and delivery work.
- (ii) The need for having further tonnage authorised in respect of overhaul and repair.
- (iii) The fact that work was being refused and that suitable hired vehicles were not obtainable within a reasonable distance of the applicants' bases.
- (iv) The increase in the applicants' businesses and those of specific customers, who also gave their reasons for preferring road as against rail transport. Certain customers detailed the inconvenience caused to them by reason of the applicants' lack of vehicles and the use of unsuitable hired vehicles.

The objection of the railway companies was concentrated on:—

- (i) Endeavouring to prove by means of statistics that railways had not fully shared in the national prosperity.
- (ii) Showing the under-utilisation of railways and their capacity to carry additional traffic—in particular, the applicants' traffic, which it was claimed was mainly, if not wholly, commercially suitable for the railways.

(iii) Giving particulars of the improvements effected in rail facilities for the transport of all classes of goods, e.g. wagon and locomotive stock, mechanical appliances, construction of additional lines, container system, extended times for collection, warehousing, "Green" and "Blue" Arrow Services and quicker transit.

(iv) Producing the results of tests made designed to demonstrate the efficiency of their services.

(v) Showing that as common carriers they should be safeguarded against hauliers carrying the higher and more remunerative grades of traffic, as otherwise basic industries might suffer.

(vi) Suggesting that the licensing authority should divide the applicants' trunk route traffic between "commercially suitable for rail-borne" and "special for road", and that the applicants' fleets should be reduced to the extent necessary to carry the latter traffic.

(vii) Endeavouring to prove that the applicants had abstracted traffic from them.

(viii) Showing that the applicants' rates were, generally speaking, below the rail rates for similar classes of traffic.

Counsel on behalf of the railway companies said, in substance, that their case could be mainly reduced to the following four propositions:—

(i) In so far as the objectors provide commercially suitable transport facilities, a grant of further facilities would involve an excess over requirements.

(ii) An excess of suitable transport facilities over requirements meant wasteful competition.

(iii) Wasteful competition was not in the public interest.

(iv) A grant which caused wasteful competition did not have due regard to the public interest.

Written decisions were given, the chief points therein being as follows:—

(a) The basis of the objectors' case appeared to rest mainly, if not wholly, upon the contention that more tonnage should not be granted to road operators of trunk services than that necessary to carry the quantum of goods for the carriage of which rail services are proved to be not suitable, having regard to Section II (2) of the Road and Rail Traffic Act, 1933, and in particular to the words "suitable" and "requirements" as used therein. This was, in my opinion, tantamount to saying that my discretion ended at the point when I had determined, if it were possible to determine, the tonnage necessary to carry on trunk services the goods which ought not under the foregoing contention to go by rail. It seemed, however, that my duty was to take into consideration anything and everything which the objectors rightfully put before me but that my discretion was unfettered other than by what is specifically laid down in Section 6 (2) of the Act and decisions of the Appeal Tribunal.

(b) Evidence led in these and numerous other cases proved that traders in these days no longer hold large stocks of goods and that they require more urgent and frequent deliveries over long distances. The fact that road hauliers had suited their services to the traders' requirements was one of the chief reasons which had acted in their favour in the past and which had caused the railway companies to improve their services. But the evidence made it clear that road transport was frequently the only form of transport which could supply suitable facilities. Regard has to be had to public interest, and this change in conditions could not be overlooked, nor could a definite public demand for speedy long-distance traffic by road be disregarded.

(c) The march of progress in the road transport industry, due in a large measure to the improved performance of the internal combustion engine, ought not to be retarded. Heavy types of motor vehicles are required for trunk road work, and the construction of such types should not be discouraged.

(d) It was estimated that the general adoption of a policy in accordance with that suggested by the railway companies would result in some thousands of trunk route vehicles ceasing to run on the road. Such a heavy loss of mobility would be extremely serious in the event of a national emergency.

(e) The public interest undoubtedly does require that goods trains on trunk services should be maintained. But the improved industrial and commercial conditions now prevailing, added to the powers already given to the railways to charge exceptional and agreed rates, enable them to enter into open competition with road transport for long-distance work, and under these new conditions there was no evidence before me that such long-distance train services were in jeopardy because of abstraction of traffic. On the contrary, the evidence revealed that the railways were sharing in the country's industrial prosperity.

(f) In the cases before me, it was found that later collections and earlier deliveries were provided by the applicants than by the railway companies, even on long-distance journeys, e.g. Yorkshire to London, and that there was a preference for the applicants' road transport over rail transport on such journeys because—

- (i) Personal attention was given by road operators to customers' requirements.
- (ii) Road transport was more dependable and speedier.
- (iii) Road services were more elastic as to running time.
- (iv) Less packing was necessary.
- (v) There was less handling of goods.
- (vi) Damage was less prevalent.

(g) The objection of the railway companies viewed from one aspect sought in effect to impose upon me the duty of analysing every load carried by road in order that it might be determined which goods were commercially suitable for carriage by rail—a question which was in itself highly controversial—and from this analysis to decide the number of vehicles which should be licensed. This argument pre-supposed that the number of vehicles licensed should be reduced in ratio to the quantum of goods now carried by road for which the railways provide commercially suitable facilities. But an examination of this contention revealed the fallacy of the supposition. If all goods commercially suitable for rail were so transported, it might still be necessary to license the same number of vehicles as previously in order to carry those goods for which rail transport is unsuitable, with the result that goods vehicles would be operated with smaller loads than were previously conveyed or would be off the road for periods in the year when there was seasonal reduction in traffic—a state of affairs which could not be regarded as being in the public interest or ever contemplated by Parliament. Some redundancy of railway wagons and road transport vehicles seemed to be inevitable under any competitive transport system, as provision has to be made for peak periods of traffic, but it was difficult to visualise that the wasteful road usage which would result from the adoption of the objectors' contention could, under any circumstances, be regarded as being in the public interest.

After having carefully reviewed the evidence, I could not see my way clear to accept the contention of the objectors, and accordingly dealt with the applications on the facts adduced at the Public Inquiries, with the result that the applications were granted either in whole or in part.

Two appeals were lodged by the objectors against the decisions, but no doubt, having regard to the subsequent decision of the Appeal Tribunal in the case of the Four Amalgamated Railway Companies and Bouts-Tillotson's Transport, Ltd., which dealt with points similar to those raised in the cases referred to above, the appeals were withdrawn.

#### *Contract "A" Licences.*

5. In the last report, a reference was made to the increase in the number of applications for "A" licences where the authorised vehicles were to be used exclusively for the purposes of a contract entered into by the applicant with a person carrying on a trade or business (not being the business of carrying

or arranging for the carrying of goods) for the carriage of goods for or in connection with that trade or business during any continuous period of not less than one year. During the year under review, there have been 391 applications for such licences, as against 281 during the preceding year. A large proportion of the applications was for new licences in substitution for existing licences.

On the 30th June, 1937, there were 384 holders of "A" contract licences as compared with 205 on the 30th April, 1936. The majority of the licence holders were in possession of other classes of licences, but it is of interest to note that at the earlier date, 48 licensees held only "A" contract licences, which licences authorised the use of 73 vehicles, and that by the 30th June, 1937, the number of persons in the area holding only "A" contract licences had increased to 92, with a corresponding increase in the number of vehicles to 145. A continued increase in the number of holders of this class of licence is not surprising in view of the apparent ease with which a contract can be obtained for the purposes of section 7 (1) of the Act and the limited powers of a licensing authority in dealing with applications made under the sub-section. Applications are not uncommon from persons who have been refused public "A" or limited "B" carriers' licences. It has come to light that in some cases a prospective haulier will approach a trader and offer to carry the trader's goods at "cut" rates if a contract is signed, and that old-established haulage firms have lost certain classes of their work owing to the abuse of the "A" contract licence. Moreover, persons who obtain such licences and find that there is insufficient work for the economic use of the vehicle appear to be tempted to supplement their earnings by the carriage for hire or reward of goods other than those of the other party to the contract. Four recent cases of such use have been brought under notice and, as revealed in paragraph 21, one conviction has been secured as a result of the proceedings instituted, while the remaining three charges were pending at the end of the period covered by this report. The detection of abuses would be facilitated if identity certificates issued in respect of vehicles authorised under "A" contract licences were more easily distinguishable from those used on vehicles authorised under public "A" licences and bore particulars of the contract. It seems, however, that amending legislation is required in order to provide that a licence shall not be granted unless the licensing authority is satisfied:—

- (i) that for special reasons the needs of the contracting trader cannot be met from existing facilities (subject to the proviso that the contracting trader's alternative of obtaining a "C" licence shall be disregarded), and
- (ii) that economic use will be made of the vehicles.

Amending legislation is also required to remove the anomalous position which arises from the fact that a newcomer who seeks to enter the haulage business by applying for an "A" contract licence is, under existing legislation, placed in a better position than the holder of a licence under the Act who, as matters now stand, may be refused an "A" contract licence on account of his previous conduct in his capacity as a carrier of goods.

#### *Limited "B" Carriers' Licences.*

6. Details of the applications for currency period licences, shown in Table I as disposed of, are as follows:—

Type of Application.	Withdrawn.	Granted.	Refused.
(i) Applications for further licences in substitution for existing licences ... ..	67	3,008	15
(ii) Applications arising from a change of legal entity	14	121	8
(iii) New applications from persons who sought to enter the industry as holders of "B" licences ...	54	171	107
(iv) Applications to which the provisions of section 11 (3) (b) of the Act applied ... ..	—	14 (Including the 5 applications referred to in Table I.)	—
Total ... ..	135	3,314	130

Eight of the refusals under (i) above and twenty-six of the refusals under (iii) were on account of lack of prosecution of the applications.

Of the total number of applications received, 917 were dealt with at public inquiries, of which number, 438 referred to applications falling under (i) above.

Many of the applications falling under (iii) above were made by persons who were prepared to dispose of horse-drawn vehicles, whilst other applications were made as an alternative to applying for variations of "A" licences.

#### *Section II (3) (b).*

7. The number of applications which have been granted under the provisions of section II (3) (b) of the Act without the holding of a public inquiry has been comparatively small. Before granting an application of this nature, it has been necessary to be satisfied that the application is one to which the relevant provisions of the Act apply.

In most of the applications received the information furnished has not satisfied me on this point and in consequence it has been found necessary to publish them in "Applications and Decisions" and to list them for hearing at a public inquiry.

#### *Variations.*

8. The number of applications for variation of "A" and "B" licences received during the year shews little change from the number received during the preceding year. It has been the practice when dealing with applications, more particularly applications for variation of "A" licences, to verify that the vehicle to be deleted has been used on a road for the carriage of goods during the currency of the licence. This verification has been obtained by means of the inspection of the relative registration book or by enquiry of the local taxation officer. As a result of enquiries, it came to light in certain cases that the vehicle sought to be deleted had been disposed of or had not been licensed for road purposes for a considerable period. Where it has been found that the vehicle had been disposed of, the vehicle in question has not been regarded as an authorised vehicle, and particulars of it have been deleted from the relevant licence under regulation 21 of The Goods Vehicles (Licences and Prohibitions) Regulations, 1936. If, after consideration of all the circumstances in the case of vehicles which had not been licensed for road purposes for a period of several months prior to the date of the application, there was reason to suppose that the vehicle had ceased to be used for a reason other than a fluctuation in business, the powers conferred under the provisions of section 10 (3) of the Act have been exercised. As stated in the last report, cases of this nature have been published in "Applications and Decisions" and dealt with at a public inquiry, thereby affording the operator an opportunity to shew cause why particulars of the vehicle should not be removed from the licence. If, after due enquiry, it has been decided to delete particulars of the vehicle from the licence, the application to vary has been treated as one for an additional vehicle. During the period under review, action under section 10 (3) has been taken in the case of seven holders of "A" licences and one "B" licence holder. The decisions involved the deletion from the "A" licences of five specified vehicles with an aggregate unladen weight of 10 tons 8 cwts. and the deletion from the "B" licence of a specified vehicle of 1 ton 10 cwts. In one case no direction was given under the sub-section, and in a further case, action was not proceeded with as the operator formally lodged an application for particulars of the vehicle concerned to be removed from his licence.

Reference was made in the last report to the fact that 6,106 applications for variations of "C" licences had been received and that this represented an increase of 40 per cent. as compared with the period ended 30th September, 1935. Of this number, 464 were outstanding at 30th September, 1936. The applications received during the year under review amounted to 6,613. Of the total of 7,077 applications, 6,976 were granted, 69 were withdrawn and 32 were outstanding at 30th September, 1937. The further increase during the year was due mainly to the effect of the issue of identity certificates, to which reference is made in paragraph 10.



*Objections.*

9. The following analysis shews the incidence of objections which were lodged and pursued, the figures in italics being the corresponding figures for the preceding year:—

Type of Application.	Approximate percentages of objections lodged and pursued.			
	" A " Licences.		" B " Licences.	
First application for licences ... ..	75.6	95	68.5	81
Applications for new licences in substitution for existing licences—				
(a) with variation as to vehicles and/or special conditions ... ..	46.0	62	59.0	70
(b) without variation as to vehicles and/or special conditions ... ..	6.0	9	5.0	33

In considering these figures, it has to be borne in mind that many more applications for further " A " licences in substitution for existing licences, including a corresponding increase in the number without variation, have been received than was the case during the preceding year, and that the applications for " B " licences in the same category were in many cases from hauliers whose applications were under review for the third time and against whose applications objections had been pursued in previous years. As regards short term " A " and " B " licences, objections were lodged and pursued in approximately 22 per cent. and 3 per cent. respectively of the applications. In the case of applications to vary " A " and " B " licences, approximately 54 per cent. and 46 per cent. respectively of the published applications were opposed.

Although there has been some diminution in the number of objections lodged, the railway companies have, apart from the cases referred to in paragraph 4, opposed practically all applications for " A " or " B " licences involving additional vehicles or a substantial increase in tonnage on the proposed exchange of vehicles. There has also been some opposition to the grant of further " A " licences in substitution for existing licences without variation where it was alleged that the licensees had been operating in districts or between places not indicated when earlier applications were made. In the case of applications for the grant of further " B " licences in substitution for existing licences without variation, the objections, so far as they have been pursued, have usually been directed towards the question of the extent of the facilities which the licensee should provide for the conveyance of goods for hire or reward, especially where the licensee carried goods in connection with his trade or business on the outward journey and goods for hire or reward on the inward journey. A number of objections has been withdrawn prior to the date of the public inquiry presumably because they had been lodged as a measure of prudence before the objectors had definitely decided whether or not to pursue them.

*Private " C " Carriers' Licences.*

10. As the provisions of sub-sections (1) and (8) of section 1 of the Act came into force on the 1st July, 1934, as regards all vehicles the use of which is required by the Act to be authorised by a " C " licence, no licences for the full currency period expired before the 30th June, 1937. Up to the 30th September, 1937, 6,689 applications for further licences in substitution for existing licences were received. Approximately 50 per cent. of the balance of the applications shewn in Table I i.e. about 1,300 were submitted by reason of a change of ownership. Prior to the introduction of identity certificates, there were relatively few notifications of changes of ownership, many cases being brought to notice indirectly. The requirements of The Goods Vehicles (Licences and Prohibitions) Regulations as to identity certificates for vehicles used under " C " licences, to which reference was made in last year's report, have also had the effect of substantially reducing the number of cases of failure to apply for variations of licences where changes of vehicles have occurred. There is reason to believe, however, that there is still considerable laxity in complying with regulation 21 of the above-mentioned regulations, which requires the return to the licensing

authority of the licence and identity certificate when a vehicle passes out of the possession of the licence holder, and a further reference is made to this in paragraph 24. Of the 13 convictions for failing to notify a change of ownership, referred to in paragraph 21, 11 related to "C" licence holders.

*Applications under Section 2 (4) of the Act.*

11. Applications from the holders of "C" licences for permission to use authorised vehicles for the carriage of goods for persons to whom such vehicles were to be let numbered 21. Of this total, 20 related to the carriage of Christmas mails and were granted. The remaining application was refused.

*Temporary Replacement of Authorised Vehicles.*

12. During the year, 352 applications have been granted under the provisions of Regulation 15 of The Goods Vehicles (Licences and Prohibitions) Regulations, 1936, which permits licensing authorities, within certain limits, to grant at short notice licences authorising the temporary replacement of vehicles which have been destroyed, rendered unfit for service or withdrawn from service for overhaul or repair. The vehicles covered by the applications were in substitution for 264 vehicles specified under public "A" licences, 3 vehicles under "A" contract licences and 85 vehicles under "B" licences.

*Holding Companies.*

13. The number of applications in respect of which a holding company signified its desire that the provisions of section 12 of the Act should apply is shewn in Table I. This number related only to applications for licences in substitution for existing licences, no fresh applications having been received. During the year, three holding companies ceased to be the holders of licences in respect of subsidiary companies. Including licences continued from the previous licensing period, there were current on the 30th September, 1937 two "A" licences and 27 "C" licences as regards which the provisions of section 12 as to holding and subsidiary companies were in force.

*Public Inquiries.*

14. Public inquiries were held on 190 days (as compared with 145 days for the year ended 30th September, 1936) at the places set out below:—

Barnsley	...	...	...	...	...	...	...	...	2
Bradford	...	...	...	...	...	...	...	...	3
Chesterfield	...	...	...	...	...	...	...	...	1
Dewsbury	...	...	...	...	...	...	...	...	1
Doncaster	...	...	...	...	...	...	...	...	5
Halifax	...	...	...	...	...	...	...	...	4
Harrogate	...	...	...	...	...	...	...	...	2
Huddersfield	...	...	...	...	...	...	...	...	1
Hull	...	...	...	...	...	...	...	...	17
Leeds	...	...	...	...	...	...	...	...	77
Rotherham	...	...	...	...	...	...	...	...	17
Sheffield	...	...	...	...	...	...	...	...	21
Shipley	...	...	...	...	...	...	...	...	6
Wakefield	...	...	...	...	...	...	...	...	9
York	...	...	...	...	...	...	...	...	24
									190

I was occupied on 105 days and Mr. Russell Gurney on 85 days.

Apart from the fact that both "A" and "B" licences were due for "renewal" in the year under review, the increase in the number of inquiries is also accounted for by the fact that objections, although fewer in number, have in many cases been more vigorously pursued than heretofore and by the continued increase in the number of applications where witnesses have been very properly called and have given evidence in support of the grant of the application. It was found that the number of applications to be conveniently dealt with in a day at a public inquiry was considerably less than in the earlier days of the Act. Requests for adjournments occurred far too frequently and were due either to the fact that the applicant attended unprepared with evidence to support the application, or because his representative had not been fully instructed. Leniency has been exercised towards such applicants, but it cannot be expected to continue indefinitely. Many holders of "C" licences applying for "B" licences appeared to think that an informal transfer of the vehicle from one licence to another was all that was necessary, and their evidence usually consisted of verbal statements to the effect that they have received requests to

carry goods for hire or reward and that they have insufficient work to keep their vehicle fully occupied in connection with their own trade or business. But apart from what has been stated above, the improvement referred to in my last report concerning the value of evidence offered has continued and the number of cases where certified statements of accounts and turnover covering comparable periods have been given has increased.

#### *Revocation and Suspension of Licences.*

15. Prior to the period covered by this report, breaches of the conditions of licences had been solely dealt with by means of warnings or, where the offences were considered to necessitate such a course, by taking proceedings in a court of summary jurisdiction. It has been found necessary, however, during the year, to exercise the powers conferred by section 13 of the Act and to hold public inquiries in four cases so as to enable the operators concerned to shew cause why their licences should not be revoked or suspended owing to the frequency of the breach of conditions of the respective licences or to the danger to the public involved in the breach. The resultant decisions, involved:—

(i) the suspension for six weeks of an "A" licence which authorised the use of four motor vehicles,

(ii) the issue, in lieu of revoking or suspending the licence, of a direction that one of five vehicles specified in an "A" licence should be removed therefrom,

(iii) a serious warning to the holder of an "A" licence, and

(iv) the suspension for one month of a "C" licence which authorised the use of nine motor vehicles and one trailer.

The holder of the "A" licence which was suspended made a request for and was furnished with a statement in writing, in accordance with section 13 (2) of the Act.

#### *Requests for Reasons in Writing.*

16. In 72 cases of refusal to grant a licence or a variation, or of refusal to grant a licence or variation in accordance with the application, requests have been received for reasons which have been furnished in accordance with section 6 (3) of the Act. In addition, as stated in the preceding paragraph, one request was made under section 13 (2) of the Act. In 8 of the 72 cases in question, appeals were lodged, one of which was allowed, three were abandoned during the period covered by this report, the remaining four cases being outstanding at 30th September, 1937\*. Most of the requests have been received from one association on behalf of its members, and it may be that they have been made not with a view to a subsequent appeal but in order to facilitate the preparation of the applicants' cases in respect of future applications.

#### *Appeals to the Appeal Tribunal.*

17. The following statement shews the numbers of the various types of appeals lodged against decisions and the results of the appeals decided:—

	1 Outstanding at 30th Sept., 1936.		2 Lodged during year.		3 Allowed.		4 Dismissed.		5 Abandoned.		6 Outstanding at 30th Sept., 1937.	
	"A"	"B"	"A"	"B"	"A"	"B"	"A"	"B"	"A"	"B"	"A"	"B"
Refusal of licence ...	1	1	3	2	1	1	—	—	2	2	1	—
Grant of licence ...	1	—	3	—	1	—	—	—	2	—	1	—
Refusal of variation ...	—	—	4	—	—	—	—	—	—	—	4	—
Grant of variation ...	16(a)	—	1	—	6(b)	—	9(c)	—	1	—	1	—
Special conditions of licence:—												
(a) Applicants	—	1	—	2	—	2	—	—	—	1	—	—
(b) Objectors	—	2	—	—	—	1	—	1	—	—	—	—
Totals ...	18	4	11	4	8	4	9	1	5	3	7	—

(a) Relates to 13 cases. Two appeals were lodged in each of three of these cases.

(b) Relates to 4 cases. Two appeals were lodged in each of two of these cases.

(c) Relates to 8 cases. Two appeals were lodged in one case.

\* Three of these have since been abandoned.

Included in the 12 appeals shewn as allowed in column 3 of the above statement are four appeals (involving three applications) which were allowed in part only. The four appeals in question consisted of three appeals against the grant of variations in respect of two "A" licences and one appeal by the applicant against the conditions of a "B" licence. The order made by the tribunal in respect of a further three appeals included in column 3 was to the effect that the applications should be reheard. These three appeals consisted of two appeals against the grant of the variation of an "A" licence and one appeal by the objectors against the conditions of a "B" licence. The two cases were duly reheard and determined at public inquiries and as regards the "A" licence variation, the decision was the same as that reached on the original hearing, whilst the objection to the conditions of the "B" licence was met by agreement between the parties concerned. No subsequent appeal was lodged in these cases.

*Dispensations from the Keeping of Records.*

18. The number of applications made under section 16 (3) of the Act for dispensations from the keeping of records as regards the carriage of goods continues to decrease. Only 23 applications were received as compared with 62 during last year and 179 during the period covered by the first report. The 23 applications were made by holders of "C" licences. In no case was it proved to my satisfaction that it was not reasonably practicable, having regard to the nature of the business concerned, for the requirement as regards which dispensation was sought, to be observed, and accordingly, the applications were dismissed.

*Maintenance of Goods Vehicles.*

19. During the year, 21,939 inspections (covering 16,720 vehicles) have been carried out and 2,766 vehicles have been prohibited from use for the carriage of goods as compared with 28,409 inspections (covering 20,388 vehicles) and 2,916 prohibited vehicles during the year ended 30th September, 1936. The increase in the proportion of prohibited vehicles to inspections for the current year as compared with the previous year is attributable to the fact that the vehicle examiners have been instructed by the certifying officers to devote more time to each vehicle inspected in order to ensure a more thorough examination than has been possible in previous years. The total of 2,766 includes 302 vehicles, the unladen weight of which exceeds 2½ tons. As regards 607 of the vehicles, the notices of prohibition were expressed to have immediate effect having regard to the condition of the vehicles. Last year the number of vehicles subjected to immediate prohibition notices was 478, or 129 fewer than during the current year. In the remaining 2,159 cases, the prohibitions were expressed not to operate until a period, which varied from one hour to ten days, had expired, thereby enabling the operator to avoid the prohibition if he took appropriate steps to rectify the defects. It is of interest to observe that as a direct result of the issue of notices of prohibition 184 of the vehicles concerned were scrapped by the licence holders.

There has been no appeal to the certifying officers or to you against a decision refusing to remove a prohibition.

The following table shews how the total number of defects discovered in the 2,766 prohibited vehicles were distributed:—

<i>Component.</i>	<i>Total number of defects on 2,766 vehicles.</i>
Steering arms and ball pins	938
Steering stops	629
Steering column, box and drop arm	1,229
Steering links (track rod and drag link)	1,049
Front swivel axles, bushes and pins	897
Front axle beam	186
Springs and front radius rods	1,216
Shackles, pins and bushes	697
Foot brakes and mechanism	1,310
Hand brakes and mechanism	1,493
Road wheels, studs, etc.	656
Frames, cross members	551

<i>Component.</i>	<i>Total number of defects on 2,766 vehicles.</i>
Rear axle and differential gear and case ... ..	208
Engine, gearbox, clutch, propeller shafts, joints and bearings ... ..	544
Exhaust system ... ..	429
Petrol system ... ..	207
Mud wings and body work ... ..	1,450
Water circulation ... ..	52
Others ... ..	428

Whilst the system of "spot checks" of vehicles is still extensively employed, more useful results have, as indicated in the last report, been obtained by a system under which vehicles have been examined at the owners' premises. Apart from the opportunity of a more detailed examination under better conditions, the examiner has come into personal contact with the maintenance personnel and has more readily been able to obtain their co-operation. It has been found that the receipt of a prohibition notice has in some cases been resented by the men responsible for the maintenance of the vehicle in question, but on the whole, the work of the vehicle examiners has been appreciated and immediate attention has usually been given to faults or defects which, if neglected, might have led to accidents on the road.

A major piece of work almost completed by the technical staff during the year has been the examination, on the operator's premises, of all vehicles specified under "A" licences in this area. A reference to this special examination was made in the last report, and it was then stated that records have been kept shewing the ages of the vehicles, the maintenance methods and the condition of the vehicles at the time of examination. These records are now available in respect of 6,087 vehicles authorised to 2,305 holders of "A" licences, including 1,431 vehicles the unladen weight of which exceeds 2½ tons. A scrutiny of the returns shews that of the 2,305 operators, 838 have their own maintenance staffs and carry out their own repairs, 784 rely solely on outside garages, 591 have their own maintenance staffs but rely to some extent on outside garages, whilst the remaining 92 have no regular system of maintenance. Moreover, of the total of 2,305 "A" licensees, the general condition of the vehicles was "good" as to 50 per cent. of their number, "fair" as to 42 per cent. and "bad" as to the remaining 8 per cent.

As stated in the last report, arrangements are made at definite intervals for the re-examination of vehicles the maintenance of which is considered unsatisfactory. Where this has not brought about an improvement, the operator has been suitably warned when appearing at a public inquiry in support of his application for a further licence. During the year, 25 hauliers were so warned.

The certifying officers report that many cases have been found where the brakes on trailers were unsatisfactory. This matter has continued to receive the special attention of the vehicle examiners, but the prohibition of the use of a trailer has been rendered difficult when an operator has more than one of the same make, as trailers have no separate identification marks. Unless there is a marked improvement in the future, the question of the identification of each separate trailer may have to be raised.

Good relations have continued to exist between the operators and the examiners in this area. As will be gathered from what has been stated above, many of the operators take a pride in the condition of their vehicles and in their methods of maintenance, and they have welcomed constructive criticism.

*Drivers' Licences (Heavy Goods Vehicles). Road Traffic Act, 1934, Sections 31 and 32.*

20. As stated in the first annual report, the spreadover arrangements adopted in this area when the licensing requirements as regards heavy goods vehicle drivers first came into force provided for approximately an equal number of licences to expire during each of the 36 months from April, 1936 to March, 1939. For this reason, the majority of the applications received during the year have been from drivers whose first licences expired during the twelve months under review. The applications received, which totalled 6,482, to which number

falls to be added 301 outstanding at 30th September, 1936, were disposed of as follows:—

Provisional licences granted ... ..	1,727
Provisional licences refused ... ..	4
Substantive licences granted ... ..	5,481
Substantive licences refused ... ..	11
Applications withdrawn before issue of provisional licence ... ..	168
Applications treated as withdrawn after the expiry of the provisional licence owing to failure to arrange a driving test ... ..	521

Provisional licences were issued as from the 1st January, 1937. The figure of 168 included 111 withdrawals before that date. Six of the refusals to grant substantive licences and the four refusals to grant provisional licences were on account of the previous conduct of the applicant as a driver of a motor vehicle. Four licences were revoked during the year by reason of the licensee's previous conduct as a driver of a motor vehicle, and one was revoked because of physical disability.

Three requests for reconsideration of the decisions given on applications for licences were made under section 31 (8) of the Road Traffic Act, 1934, and in two cases it was decided to grant a licence. In the other case, the earlier decision was adhered to. There were no appeals to courts of summary jurisdiction against any of the decisions.

Details of the driving tests carried out are as follows:—

Passed at first test ... ..	788
Failed at first test and passed at subsequent test ... ..	20
Awaiting further test ... ..	46
Failed and licences refused ... ..	5
Number of driving tests carried out by area examiners ... ..	903
Number of applicants tested and passed by persons appointed to conduct tests under section 6, which tests have been accepted for the purposes of section 31 of the Road Traffic Act, 1934 ... ..	138

Driving tests have been accepted for the purpose of section 31 from twelve commercial firms—an increase of two over last year—and from one police authority.

Eight heavy goods vehicle driving licences have been granted during the year under arrangements which enable serving soldiers to be tested by the army authorities before the termination of their military service.

The proportion of cases where the applicant claimed a licence as a right under section 31 (6) has decreased, and at the end of the period under review, was approximately twenty-five per cent. of the number of new applications. Many of the applicants who sought a heavy goods vehicle driver's licence for the first time and who claimed the grant of such a licence without passing a driving test stated that they had been unemployed or had driven only light vehicles since the year ended 1st April, 1934. It seems that where an applicant can satisfy me that he comes within the provisions of section 31 (6) of the Road Traffic Act, 1934, the question of his fitness to drive a heavy goods vehicle does not arise on his first application. For this reason, in a limited number of cases, licences have been granted to aged drivers or to persons who have declared a physical disability which, however, had not prevented them from driving a heavy goods vehicle during the prescribed period from 1st April, 1933 to 1st April, 1934. As this right can, however, be exercised only on the first application, it has been the practice to require a driving test to be carried out when a further application for a licence has been made. It has also been decided to require applicants over 65 years of age, other than the diminishing number who could claim a licence as a right, to submit to a driving test. Moreover, the time has now arrived when in all cases where it is stated that a licence could be claimed as a right, confirmation of the applicant's statements has been sought. As, however, this confirmation relates to the applicant's employment during the twelve months 1st April, 1933 to 1st April, 1934, it is becoming increasingly difficult to obtain, and unavoidable delays have sometimes occurred. In such cases, the applicant has been advised that he might take out a provisional licence if he so desired.

Where a licence could not be claimed as a right, a driving test has been required save in exceptional cases. The issue of the Heavy Goods Vehicles (Drivers' Licences) Regulations, 1936 dated 25th November, 1936, which give effect, inter alia, to the provisions of section 2 of the Road Traffic (Driving Licences) Act, 1936, regarding provisional licences, has simplified the question of driving tests which, as indicated last year, was a matter of difficulty, as an applicant could not be tested on a road with a heavy goods vehicle. Where a driving test has been necessary, a provisional licence has been issued provided that the previous conduct of the applicant as a driver of a motor vehicle has been satisfactory. The applicant has been advised when the provisional licence has been issued as to the type of vehicle he should provide for a test, and normally a licence has been granted covering the type of vehicle on which the test has been carried out. Where, however, the test has been carried out on an articulated vehicle, the licence has been granted to cover articulated vehicles and heavy motor cars. These two classes have been found to cover the requirements of the majority of heavy goods vehicle drivers. An applicant who desired to drive a vehicle specified in an additional class not covered by his licence has, on application, been issued with a provisional licence covering the type of vehicle in the additional class to enable him to undergo a further driving test.

There were 13,314 substantive licences current at the 30th September, 1937, as compared with 12,224 on the 30th September, 1936.

*Enforcement of the Act and Regulations.*

21. The following statements shew the various classes of offences and the number of charges made, etc.

*Proceedings instituted by the Licensing Authority.*

Offence.	No. of charges pending at 1.10.36.	No. of charges made during the year.	No. of convictions secured.	No. of charges dismissed.	No. of charges pending.
<i>Offences against the Road and Rail Traffic Act, 1933.</i>					
Using a vehicle except under a licence ...	45	362	382	4	21
Drivers failing to keep current records...	68	677	696	6	43
Licence holders failing to cause current records to be kept ... ..	69	211	253	5	22
Drivers failing to produce records when required to do so ... ..	8	115	110	1	12
Drivers failing to deliver records to licence holders ... ..	—	12	11	—	1
Drivers failing to carry current records	—	14	14	—	—
Licence holders failing to preserve records ... ..	—	1	—	—	1
Licence holders failing to produce records to be preserved by them ...	—	8	8	—	—
Using a vehicle authorised under an "A" licence for the carriage of goods in connection with the licence holder's own business ... ..	—	3	3	—	—
Using a vehicle authorised under an "A" contract licence for the carriage of goods for hire or reward otherwise than stated in contract licence ...	—	4	1	—	3
Breach of special conditions attached to "B" licence ... ..	2	13	14	—	1
Using for hire or reward a vehicle authorised under a "C" licence ...	5	24	28	1	—
Driving a vehicle whilst a prohibition was operative ... ..	—	16	16	—	—
Causing a vehicle to be driven whilst a prohibition was operative ... ..	3	13	13	—	3
Offences in making application or using document with intent to deceive ...	1	5	6	—	—
Altering identity certificate with intent to deceive ... ..	—	4	4	—	—
Altering record with intent to deceive...	—	8	8	—	—
Making false statement to obtain a licence ... ..	—	4	4	—	—

Offence.	No. of charges pending at 1.10.36.	No. of charges made during the year.	No. of convictions secured.	No. of charges dismissed.	No of charges pending.
<i>Offences against the Goods Vehicles (Licences and Prohibitions) Regulations.</i>					
Failing to display identity certificate ...	12	61	71	—	2
Licence holder failing to notify change of address ... ..	—	3	3	—	—
Failing to notify change of ownership of an authorised vehicle ... ..	5	8	13	—	—
Licence holder failing to produce licence	—	1	1	—	—
Licence holder failing to notify defaced identity certificate ... ..	—	1	1	—	—
<i>Offences against the Road Traffic Act, 1930.</i>					
Driving in excess of the hours permitted by Section 19 of the Act ... ..	26	40	61	—	5
Permitting an employee to drive in excess of the hours permitted by Section 19 of the Act... ..	22	184	176	—	30
<i>Offences against the Road Traffic Act, 1934.</i>					
Driving a heavy goods vehicle when not licensed for the purpose ... ..	10	36	44	1	1
Employing an unlicensed person to drive a heavy goods vehicle ... ..	7	31	36	1	1
<i>Other Offences.</i>					
Aiding and abetting in offences against the Acts and Regulations ... ..	—	20	18	2	—
Conspiring to obtain a carrier's licence...	—	2	—	2	—
Totals ...	283	1,881	1,995	23	146

*Proceedings instituted by Chief Officers of Police.*

Offence.	No. of charges made.	No. of convictions secured.	No. of charges dismissed.
<i>Offences against the Road and Rail Traffic Act, 1933.</i>			
Using a vehicle except under a licence ... ..	16	16	—
Drivers failing to keep current records ... ..	651	651	—
Licence holders failing to cause current records to be kept	67	66	1
Drivers failing to produce records when required to do so.	26	26	—
Drivers failing to deliver records to licence holders ...	8	8	—
Drivers failing to carry current records ... ..	18	18	—
Using for hire or reward a vehicle authorised under a "C" licence ... ..	1	1	—
Altering record with intent to deceive ... ..	2	2	—
<i>Offences against the Goods Vehicles (Licences and Prohibitions) Regulations.</i>			
Failing to display identity certificate ... ..	47	47	—
<i>Offences against the Road Traffic Act, 1930.</i>			
Driving in excess of the hours permitted by Section 19 of the Act ... ..	39	39	—
Permitting an employee to drive in excess of the hours permitted by Section 19 of the Act ... ..	21	21	—
<i>Offences against the Road Traffic Act, 1934.</i>			
Driving a heavy goods vehicle when not licensed for the purpose ... ..	23	23	—
Employing an unlicensed person to drive a heavy goods vehicle ... ..	26	25	1
<i>Other Offence.</i>			
Aiding and abetting ... ..	1	1	—
	946	944	2



It will be seen that there has been a noticeable decrease in the number of prosecutions for using unauthorised vehicles, the number of charges made being 378 as compared with 634 during the previous year. This decrease is no doubt due to the fact that the licensing provisions of the Act are at last becoming more widely known amongst the smaller ancillary operators. There has also been a decrease in the number of charges for failing to cause current records to be kept, 278 charges being made as compared with 700 last year. The general position as regards the observance of the Acts and the regulations is, however, still far from satisfactory, and during the year, in spite of the decreases referred to above, 2,939 convictions were secured for offences against section 19 of the Road Traffic Act, 1930, various sections of the Road and Rail Traffic Act, 1933 and the Road Traffic Act, 1934, as well as the regulations made thereunder.

Although the decrease in the number of charges for failing to cause records to be kept appears to indicate that operators are exercising more care in this respect, there is still considerable need for improvement, especially as regards operators with only one or two vehicles. The importance of the keeping of records is not appreciated by some operators; others appear fully to realise that correct records may reveal offences against section 19 of the Road Traffic Act, 1930, whilst others consider that they have done all that is required if they hand a supply of record forms to their drivers. Previously some courts of summary jurisdiction have dismissed cases under the Probation of Offenders' Act and this appears to have led to the belief in certain quarters that offences of this character are not regarded seriously, but signs are not wanting that the leniency hitherto shewn will not endure. It may be mentioned that during the year one operator was fined £20 for failing to cause current records to be kept. The increase in the number of convictions for permitting an employee to drive in excess of the hours permitted by section 19 of the Road Traffic Act, 1930 from 102 last year to 197 during the current year reveals the fact that there is still a widespread disregard of the provisions laid down by Parliament with regard to hours of driving and intervals for rest. This is to be regretted as, apart from the requirements of section 19 of the Act, the number of hours a driver is required to work is an essential part of the conditions of service which should be the basis of fair competition. The lack or unreliability of the records of those operators who disregard section 19 has necessitated as an experimental measure the adoption of a system of road checks undertaken sometimes in collaboration with other traffic areas. During these checks the index marks of goods vehicles passing through the points of observation have been noted, and subsequently the relative records have been inspected. The checks, which have been welcomed by responsible hauliers, have had good effects, but they have so far been carried out to a limited extent only. The investigations necessary prior to prosecutions where offences have been revealed have thrown a heavy burden on the traffic examiners. At the moment there appears to be no effective alternative to this method of detecting, in particular, offences against section 19, and the appointment of additional traffic examiners may have to be considered.

In the last report it was stated that where it was felt that such a course was appropriate, the persons concerned have been warned as to their future conduct instead of being prosecuted. Such warnings are now comparatively few in number, as the time has arrived when alleged contraventions of the Acts or the regulations, whether arising out of reports made by the police or by traffic examiners, should normally be brought before the courts by way of the laying of informations. Where a successful prosecution is undertaken in connection with an offence which involves a breach of the conditions of the licence, the operator is warned as to the probable effect of future breaches and, in the case of "A" and "B" licence holders, a similar warning is given where the offence reflects on his conduct as an operator. The general effect of the prosecutions undertaken and the subsequent publicity obtained have been of assistance to the large body of responsible operators who appreciate the purpose of the Act and who are making efforts to continue the improvements in the industry which have been effected since it became law.

The co-operation of the police is vital to the effective enforcement of the Act and the regulations, and the prosecutions undertaken by them have an effect out of all proportion to the number of convictions secured. I wish to express my gratitude to the Chief Constables and their staffs not only for the valuable

assistance rendered in the detection of offences but also for the deterrent effect that active measures taken by police constables in uniform have had upon the type of operator who otherwise might be prepared to regard lightly the conditions of his licence.

There is one particular prosecution included in the foregoing statement which was undertaken when circumstances came to light which appeared to shew that a person was acting in flagrant contravention of the law. The charges on indictment were that—

(i) with intent to deceive, he had allowed another person to use an identity certificate contrary to section 34 (1) of the Road and Rail Traffic Act, 1933,

(ii) for the purpose of obtaining the grant of an "A" licence in respect of a motor vehicle to yet another person, he had knowingly made a false statement purporting to declare that the said person was carrying on business as a haulage contractor at a certain address and, on the material date, owned the motor vehicle or had it in possession under a hire purchase agreement, contrary to section 34 (3) of the above-mentioned Act,

(iii) for the purpose of obtaining the variation of an "A" licence in respect of the motor vehicle referred to in (ii), he had knowingly made a false statement purporting to declare that the person referred to in (ii) was carrying on business as a haulage contractor at yet another address and on the material date owned a motor vehicle or had it in possession under a hire purchase agreement, contrary to section 34 (3) of the above Act,

(iv) for the purpose of obtaining the grant of an "A" licence to yet another person in respect of a motor vehicle, he had knowingly made the same false statement, *mutatis mutandis*, as in (ii) above, contrary to section 34 (3) of the Act,

(v) he had conspired with a second party to obtain the grant of an "A" licence to the person referred to in (iv) by means of the false statement also referred to in (iv),

(vi) for the purpose of obtaining the variation of an "A" licence in respect of the motor vehicle referred to in (iv), he had, together with the second party referred to in (v), knowingly made a false statement purporting to declare that the person referred to in (iv) was carrying on a haulage business at a certain address and at the material date intended to acquire, or become possessed of, under a hire purchase agreement, another motor vehicle, and

(vii) he had conspired with the second party referred to above unlawfully to obtain the variation of an "A" licence referred to in (vi) by means of the false statement also referred to in (vi).

The hearing of the case at the Leeds Assizes occupied four days, and the person was found guilty on the charge of allowing the identity certificate to be used with intent to deceive and was also found guilty on the charges of making false statements. The second person charged on counts (v), (vi) and (vii) was acquitted, and accordingly the conspiracy charges fell to the ground.

The defendant was sentenced to six months' imprisonment on each of the charges upon which he was found guilty, the sentences to run concurrently, and was ordered to pay £100 towards the costs of the prosecution. In passing sentence, Mr. Justice Macnaghten described the offences as very serious and said that he was satisfied on the facts disclosed that the person concerned had been making a business of deceiving the licensing authority so as to sell licences at a profit to himself.

In the statement included in the previous report, two charges for using for hire or reward a vehicle authorised under a "C" licence were shewn as having been dismissed by courts of summary jurisdiction. At my instigation the magistrates had been asked to state cases for the decision of the High Court, but the decisions of the latter court were not available until the period at present under review. The two operators concerned were societies and, briefly, they provided for their members facilities for the delivery of "home" coal supplies and for their conveyance to and from work at the colliery, payment being made by the members for these services. One of the societies was a limited company

registered under the provisions of the Industrial and Provident Societies Act, 1893; the other was a collection of individuals rather in the nature of a club, who joined together and purchased motor vehicles and used them for the purposes already described.

The Divisional Court took the view in the first case mentioned that the society, which was a limited company, was a legal entity apart from its members, and that when the individual member was employing a vehicle belonging to the limited company for the purpose of making a delivery of coal at his home, he was causing the vehicle to be used for the carriage of goods for hire or reward. It was mainly on these grounds that the appeal was allowed.\*

In the second case, it was held that the persons at whose homes the coal was being delivered were among the owners of the motor vehicles which were making the delivery and could not be regarded as hiring from themselves and rewarding themselves. This appeal was, therefore, dismissed.†

#### *Wages and Conditions of Employment of Drivers and Statutory Attendants on Goods Vehicles.*

22. One representation made by an organisation representative of persons engaged in the road transport industry has been referred to the chief conciliation officer (north eastern area) of the Ministry of Labour. A small number of enquiries and complaints received from individuals has similarly been referred to the Yorkshire Joint Conciliation Board for the Motor Transport Industry (Goods). No developments have arisen necessitating further action by me.

In view of the presentation to Parliament in May, 1937 of the report of the Committee on the Regulation of Wages and Conditions of Service in the Road Motor Transport Industry (Goods), it is to be expected that the general position with regard to these matters will remain static until decisions are taken on the recommendations of that committee.

#### *Rates.*

23. The various associations and rates committees in the area, to whom reference was made last year, have, it is understood, made considerable progress in the direction of co-ordinating and extending their activities with a view to the establishment of an agreed rates structure. That the endeavours of operators in the area to attain such a rates structure are likely to have been directed along proper channels will be gathered from the report on Service and Rates of the Transport Advisory Council which, although not published until after the end of the period relating to this report, recommended that, as a first step, the opportunity should be afforded for the road hauliers to build up a rates structure for their own industry.

#### *General Remarks.*

24. The appended statistical tables, which show the position of the industry at the 30th April, 1936 and at the 30th June, 1937, have been the subject of comment in the press and elsewhere on the ground that there has been a marked diminution in the number of "A" licensed vehicles concurrently with a pronounced increase in the number of vehicles authorised under "C" licences. It has been stated that it is obvious that many users of transport who would have relied upon the road haulage industry for the carriage of their goods have been forced into purchasing vehicles for their own use, thus, in effect, robbing Peter to pay Paul, and inflicting onerous restrictions upon those who depend upon road transport for their livelihood. In view of the startling nature of the proposition stated, it has been deemed to be advisable to examine the statistics closely so far as this traffic area is concerned.

Dealing first of all with the number of "A" (currency) motor vehicles owned by operators holding "A" currency licences, the examination shows that the decrease from 7,110 to 6,844 (excluding railway companies), a reduction of 266, is chiefly accounted for as follows:—

- (i) During the year, 116 "A" licences, under which were specified 159 vehicles, were either allowed to lapse or were surrendered, presumably because the businesses of the operators concerned had ceased to exist.

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\* *Wurzal v. Houghton Main Home Coal Delivery Service, Ltd.* † *Wurzal v. Atkinson and Others.* (Reports on Traffic Cases. Vol. 25, p. 59).

(ii) A large number of "A" licences expired during the year, as stated in paragraph 4. Of this number, the majority of cases came up for review between the 1st October, 1936 and the 30th June, 1937, that is to say, before the later date to which the statistics relate. Many of the original applications—on which the statistics for the 30th April, 1936 were based—were in respect of "claimed tonnage" only and had been granted without a public inquiry, but when the applications for further licences were received, many were found to be in respect of fewer vehicles than had been originally authorised. Moreover, a few applicants who had applied for the same number of vehicles previously specified in their licences were unable, by their evidence at a public inquiry, to justify the need to use all the vehicles applied for, and fewer vehicles were consequently authorised.

(iii) There was a reduction of 23 vehicles previously specified under "A" licences where it was found that the vehicles were used for the carriage of "home" coal supplies only and where, consequent upon the High Court ruling mentioned in paragraph 21, "A" licences were unnecessary.

(iv) Applications for licences and for variations have revealed that in a few cases vehicles had been disposed of prior to the 30th April, 1936, the earlier date to which the statistics relate, and that the operators had failed to notify the fact as required by regulation 21 of The Goods Vehicles (Licences and Prohibitions) Regulations. In such cases, the vehicles have since been deleted from the licence.

(v) Fourteen vehicles were removed from licences between the 30th April, 1936 and the 30th June, 1937 under the provisions of section 10 (3) of the Act.

From the foregoing, it will be gathered that the diminution in the numbers of vehicles authorised under "A" licences is not due to any "onerous restrictions" so far as this area is concerned.

The figures relating to motor vehicles owned by persons holding "C" licences only, viz. 27,138 vehicles at the 30th April, 1936 and 31,212 vehicles at the 30th June, 1937, have also been examined, and it has been found that the increase is less marked than is revealed by the April, 1936 and June, 1937 statistical returns chiefly owing to the fact that a large number of vehicles have been unlawfully specified under two licences owing to the failure of licence holders, as stated in paragraph 10, to comply with regulation 21 of The Goods Vehicles (Licences and Prohibitions) Regulations, which requires the return to the licensing authority of the licence and identity certificate when a vehicle passes out of the possession of a licence holder. Cases of failure to comply with this regulation, unless brought to light indirectly, are not usually revealed until the licence expires. As stated in paragraph 10, however, no licence for the full currency period expired before the 30th June, 1937, the later date to which the statistics relate, so that by that date the number of "C" vehicles which appear to have been specified under two licences was much greater than it was at the 30th April, 1936. There is reason to believe that prior to the introduction of identity certificates (as from the 1st October, 1936), a number of persons was operating unauthorised vehicles which should have been and subsequently were specified in "C" licences. The number of such cases at the 30th April, 1936 is of course not known but it may safely be assumed that had such vehicles been authorised at that date, the difference between the figures for 30th April, 1936 and those for 30th June, 1937 would not have been so marked.

Proof of the assertion that the increase of vehicles operated under "C" licences is more apparent than real is to be found in the fact that the records shew that by the 30th September, 1937—the last day covered by this report—the number of authorised vehicles owned by persons holding only "C" licences was 28,896, or a reduction of 2,316 on the 31,212 vehicles shewn in the statistical return for the 30th June, 1937. It is true that this figure of 28,896 vehicles is still in excess of that for 30th April, 1936, viz. 27,138, but as has already been inferred, the extent to which even this figure may be swollen will be revealed only as licences expire.

It may be mentioned that the majority of the new applicants for "C" licences during the year ended 30th September, 1937 applied for such a licence in respect of one vehicle only and, as already stated, approximately 50 per cent. of these applications were submitted by reason of a change of ownership. As applicants are not required to give any material information beyond their names, addresses, businesses and particulars of the vehicles they desire to have specified under a licence, it is not known how many of the remaining 50 per cent. of the new applicants required licences owing to new businesses being started, or how many had previously operated the vehicle in connection with a trade or business and had been unaware that a "C" licence was necessary until identity certificates were issued. Similarly, in the case of applications to vary, where an increase in the number of vehicles specified under the licence was involved, the increase seldom amounted to more than one vehicle, but the number of cases where this was due to increased trade or to the abandonment of horses, or to some other cause, is not known. If reliable information regarding the extent to which traders may tend to use or to cease to use their own transport is to be available, it may be necessary to take measures to provide for applicants for "C" licences to give fuller information than is given at present.

There have been cases where a trader appearing at a public inquiry as a witness in support of an application for an "A" or a "B" licence, or for a variation of such a licence to add an additional vehicle, has stated that his own business has increased and that unless the application is granted he may have to acquire a vehicle and carry out his own haulage under a "C" licence. All such statements have been dealt with on their merits, having regard to the evidence as to the existing facilities, the needs of the trader and the other provisions of the Road and Rail Traffic Act, 1933. There is, however, every reason to believe that the number of authorised "A" and "B" vehicles in the area is being maintained at a level adequate to meet the needs of those persons who desire to use public facilities rather than to use their own transport.

A few additional items of interest are revealed from a scrutiny of the statistical information. The decrease in the number of "A" licensed vehicles was accompanied by a reduction in the number of operators from 3,131 to 2,913 between 30th April, 1936 and 30th June, 1937. This reduction of 218 is almost wholly accounted for by the reduction in the number of operators owning one or two vehicles. More than half of the total number of "A" licensees operate only one vehicle, the position being more marked in the Yorkshire Traffic Area than for the country as a whole. It is of interest to note that, excluding railway companies, the average number of motor vehicles in possession per "A" licence at 30th June, 1937 was 2.30 in this area as compared with 3.07 for all areas.

As regards holders of "B" licences, the position at the 30th June, 1937 shews little change from that at the 30th April, 1936. The small decrease is mainly accounted for by the fact that 196 holders of limited "B" carriers' licences surrendered their licences, whilst 171 persons applied for and were granted a "B" licence for the first time. As in the case of "A" vehicles, the proportion of "B" operators with one vehicle is higher than for the remainder of the country. The average number of motor vehicles in possession per "B" licence at the 30th June, 1937 was 1.35 in this area as compared with 1.55 for all areas. In the last report, a reference was made to the fact that the statistical information relating to the industry at the 30th April, 1936 shewed that the percentage of "B" licence holders in the Yorkshire Traffic Area was lower than in any other area, with the exception of the Metropolitan Area. The percentage for all areas was 15.29 at the 30th April, 1936 and 13.76 at the 30th June, 1937. The corresponding percentage for the Yorkshire Traffic Area fell from 13.40 to 12.44, so that the disparity is now less marked.

In the last report it was stated that no scheme had yet emerged involving small operators in an amalgamation of their capital and resources by a process of forming themselves into limited liability companies. So far as this area is concerned, the position has remained unchanged. It is observed, however, from the technical press, that towards the end of the period covered by the present report, a move in the direction indicated appears to have been initiated in the Midlands and that, according to a subsequent press report on the subject, a company is

being formed with a view to the co-ordination and rationalization of road transport and with the intention of providing certain services, including a network of goods services connecting the Midlands with other industrial areas and with the chief ports. It may be that such a scheme is indicative of other schemes of co-operation amongst hauliers.

*Conclusion.*

25. I am pleased to state that the co-operation of the majority of operators, the assistance of the various associations and the publicity given by the press, have again contributed to the effective operation of the licensing system established by the Road and Rail Traffic Act, 1933. I also desire to acknowledge my thanks to those local authorities who have so kindly continued to provide accommodation for holding public inquiries.

In conclusion, I wish again to record my appreciation of the efficient services of the clerk, certifying officers and other members of the staff of the area.

I have the honour to be, Sir,

Your obedient Servant,

JOSH. FARNDALE,  
Licensing Authority.

## NORTH-WESTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

As Licensing Authority for the North Western Traffic Area under the Road and Rail Traffic Act, 1933, I have the honour to present my third Annual Report which relates to the year ended 30th September, 1937.

### Licensing of Goods Vehicles.

(1) The following statement sets out the licensing position in respect of that period:—

TABLE I.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>"A" Licences :—</b>					
Currency Period ... ..	860	3,357	108	3,672	82
Short Term Section 3 (3) ... ..	2	64	5	52	9
Contract ... ..	—	405	31	374	—
<b>"B" Licences :—</b>					
Currency Period ... ..	194	5,804	87	5,438	207
Short Term Section 3 (3) ... ..	2	73	8	54	13
<b>"C" Licences :—</b>					
Currency Period ... ..	250	14,387	29	13,696	—
Short Term Section 3 (3) ... ..	—	230	2	228	—

	"A"	"B"	"C"
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..	1	—	19
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	105	56	—
Short Term Administrative Licences issued (Section 3 (4)) ... ..	103	107	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... ..	221	55	—

TABLE II.—*Applications for variation of Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>Variations relating to Vehicles</b>					
<b>"A" Licences :—</b>					
Published and dealt with at Inquiry ... ..	} 317	} 2,745	—	250	128
Published but determined without Inquiry ... ..			82	203	—
Not published ... ..			15	2,289	—
<b>"B" Licences :—</b>					
Published and dealt with at Inquiry ... ..	} 100	} 1,611	—	137	50
Published but determined without Inquiry ... ..			30	80	—
Not published ... ..			11	1,343	—
<b>Variations of Conditions attached to "B" Licences...</b>	40	194	17	151	42

(2) There were 183 Public Inquiries and according to the convenience of the parties these were held at the following centres:—Bangor, Barmouth, Blackburn, Blackpool, Caernarvon, Chester, Liverpool, Manchester, Morecambe, Newtown (Mont), Preston, Warrington, Welshpool and Wrexham. One Private Inquiry was held at Manchester.

(3) *Objections.*

<i>Application.</i>	<i>Percentage of Objections Lodged and Pursued.</i>
<i>" A " Licences:—</i>	
New Applications ... ..	70
Renewals ... ..	6
Notified Variations ... ..	63
<i>" B " Licences:—</i>	
New Applications ... ..	65
Renewals ... ..	8
Notified Variations ... ..	65

*Applications under Section 2 (4) of the Act.*

(4) The number of applications under the above sub-section made by holders of " C " licences was 14. These applications were in respect of the carriage of Christmas mails for the Post Office and all were granted.

*Appeals.*

(5) The number of appeals lodged during the year was 25 and, in addition, three were outstanding from the previous year. Of this total, 24 were appeals by applicants for licences or variations of licences and four were by objectors. During the year five appeals were allowed by the Appeal Tribunal, three were dismissed and nine were withdrawn by the appellants, leaving 11 outstanding at the 30th September, 1937.

*" A " Licences.*

(6) Practically all the original " A " licences in this area were issued during the year ended 30th September, 1935, and therefore fell to be " renewed " during the year now under review.

(7) In connection with these applications for licences in continuation of existing licences I found at first that very many applicants who were required by Section 5 (1) (c) of the Act to describe upon the application form the facilities for the transport of goods intended to be provided by them under licence, described such facilities in vague terms such as " General goods, Great Britain ". In the early days of the operation of the Act I frequently found it necessary to question the adoption of this practice by applicants for " Discretionary tonnage " in connection with licences for a first currency period and, in other than very exceptional cases, I found that a clear and concise definition of the normal facilities to be provided under the licence could be given.

(8) I decided therefore to issue with the application forms for the second currency period a special request that applicants should give a proper description of their intended activities. At the same time I emphasised that the requirement envisaged only the normal user of the vehicles and pointed out the authorised freedom of operation under " A " licences. There was some opposition to my suggestions in this respect, but I was able to satisfy both individuals and associations of carriers that the provision of the required particulars was essential to me in carrying out my functions under the Act. This procedure has enabled potential objectors to ascertain from the application whether their interests were likely to be affected and in a large number of cases has avoided the necessity for objection and consequent investigation at Public Inquiries. The " A " licences issued during the year have, therefore, been so issued with fairly complete knowledge on my part of the facilities intended to be provided under them.

(9) A striking feature is that some 250 persons who were granted " A " licences for a first currency period failed to apply for licences in continuation. Probably one of the main reasons for this is that at the inception of the Act many persons, although not in possession of motor vehicles, sought to safeguard their rights to " claimed tonnage " by obtaining licences in respect of vehicles to be hired or acquired: the prospect of again establishing themselves in business



not having materialised they were not in a position to justify the grant of further licences. From information which has reached me from time to time, however, I have been led to the belief that in some cases persons who were able to obtain "A" licences by virtue of having been the operators of vehicles during the basic year have adopted the practice of "lending" these licences to other persons providing transport who finance the purchase of vehicles and control the operations very closely, leaving the licence holder in a position little different from that of an employee.

(10) With the reduction in the number of "A" licences referred to above, it may be a fair assumption that, as regards quantum, a measure of stability in the industry has been attained and that from now onwards any changes will in a large measure depend upon fluctuations in trade and industry. This stability is evidenced by the fact that during the year only fourteen applications for "A" licences in continuation of existing "A" licences were refused, the number of vehicles involved being sixteen.

(11) Quite soon after the commencement of the licensing of road passenger services under Part IV of the Road Traffic Act, 1930, there appeared a marked tendency to merge what might be termed the essential services (as distinct from the "pleasure" services) of small operators into large groups. It might be as well, therefore, at this juncture to note that more than fifty per cent. of the persons operating goods vehicles under "A" licences issued in this Area own only one vehicle each, also that the average holding of vehicles is only 2·8 per licence. Whatever might be the benefits or otherwise of amalgamation in connection with the transport of passengers, it seems to me, that to the extent to which the transport of goods by road is organised in such small units it must be limited in its usefulness to the trading community generally. It is accordingly somewhat surprising to find that although for three years the haulage industry has been protected by the licensing system from uncontrolled competition, there still does not appear to be any marked tendency towards organisation into larger units. Possibly one of the reasons for the continued existence of the one-vehicle operator is that by driving his own vehicle, keeping his own accounts and using his home as an office, he is able to operate economically to himself at rates lower than would be possible in the operation of a larger fleet. I do not desire to suggest that on this account there should be any diminution in the number of small operators at present engaged on local traffic who, by personal service and local knowledge, are often in a position to offer facilities of greater usefulness to their particular customers than normally could be obtained from larger and more centralised organisations.

(12) A substantial proportion of one-vehicle operators do not, however, deal directly with persons requiring transport but obtain their loads through the agency of clearing houses or forwarding agents. Although, as I have stated above, the haulage industry generally is not organised in units of such a size as to offer comprehensive facilities for the long distance transport of goods in any desired direction, many clearing houses and forwarding agents are able to offer these widespread facilities by employing numbers of small operators holding "A" licences.

These holders of licences are not the principals in the traffic they undertake and are therefore not in a position themselves to furnish the evidence necessary for a full assessment of the need for their services. In some cases this difficulty is met by the clearing houses furnishing the proper evidence, but it cannot be said that this is the normal practice. The position is far from satisfactory, because the amount of traffic undertaken by these agencies must in the aggregate be very considerable.

#### *Contract "A" Licences.*

(13) The number of contract "A" licences applied for during the year was 405, as against 311 in the previous year. In this connection I have received complaints which have in some cases been confirmed by observations undertaken by Examiners that persons operating vehicles under contract "A" licences have not observed the fundamental condition that the vehicles should be used exclusively for the carriage of goods under the contract for which the licence was granted. The prevention of abuse in this direction largely depends upon the enforcement of the conditions attached to the issued licence and it would be very difficult to secure effective compliance with the licence conditions by

action in connection with the applications. I have, however, made it my practice to enquire very carefully into the bona fides both of the applicants for licences and of the persons offering the contracts forming the basis of the applications before authorising the vehicles concerned.

*Objections.*

(14) It will be observed that the proportion of "renewal" applications in respect of which objections were lodged was 10 per cent. in the case of "A" licences and 11 per cent. in the case of "B" licences. So far as "A" licences are concerned the number of objections was considerably higher during the early part of the year under review. The decision of the Appeal Tribunal in the Bouts Tillotson case which laid down the principles which in their view should be followed by Licensing Authorities and which I found myself able to apply in appropriate cases in dealing with "renewal" applications, clarified the position to a considerable extent, with the result that the number of objections decreased considerably and in the latter part of the year related mainly to applications seeking extended facilities either by way of additional vehicles or, in the case of "B" applications, by a relaxation of the conditions of operation for hire or reward.

*"B" Licences.*

(15) As regards "B" licences there has been practically no change as compared with the previous year. Any new licences issued have been in respect of operations for hire or reward of a very limited character.

*Applications under Section 11 (3) (b) of the Act.*

(16) During the year 215 applications for "A" or "B" licences were made to which the applicants indicated their desire that the provisions of Section 11 (3) (b) of the Act should be applied. In these cases where the necessity for the "transfer" of the licence has arisen from the death of the licence holder it has been my general practice to grant the new licence to the widow or other lawful successor to the business without publication of the application in Part I of "Applications and Decisions." I have applied the same procedure in cases where individuals or partnership firms have formed themselves into limited liability companies. Where, however, the sale of the business carried on by a licence holder has been necessitated by insolvency or it has come to my knowledge that the vendor was disposing of his business because of financial difficulties, I have for obvious reasons instructed that such applications should be published with a view to subsequent inquiry either private or public.

(17) The three classes of application mentioned above cover a large proportion of the total applications to which Section 11 (3) (b) might be applied. The balance has consisted of applications relating to ordinary sales of businesses either to newcomers into the haulage industry or to persons already holding "A" or "B" licences. Many considerations arise in connection with these cases and the decision whether or not to publish the applications has depended upon the circumstances in each case.

(18) It has been argued before me on many occasions that I was not empowered to publish applications to which the terms of Section 11 (3) (b) could be applied; alternatively that if I could publish such applications it was not in the public interest that I should do so. I could not in any circumstances agree that I should be fulfilling my proper functions under the Act if I were to relax the exercise of my discretion in this matter as it is being exercised at the present time. Very rarely have I found that the circumstances attaching to the applications which have been published and subsequently made the subject of Public Inquiry have not warranted such inquiry.

(19) On 16th September, 1937, I was served with a summons to enter an appearance in the High Court upon an application to the Court seeking a rule that it was unlawful for me to publish and subsequently hold a Public Inquiry into an application made in the terms of Section 11 (3) (b) by an operator in this Area. The Court has now adjudicated upon the application and has decided that the procedure I proposed to adopt was in accordance with the law.

*"C" Licences.*

(20) A large proportion of the original "C" licences in this Area were issued during the months of July, August and September, 1934, for a currency period

of three years. In the corresponding months of 1937, therefore, there fell the task of dealing with some 13,000 applications for fresh licences in substitution for those expiring. This involved a considerable strain upon my office organisation but with the aid of temporary clerical assistance the new licences were issued without material delay.

The rate of increase noted in the previous year in the number of "C" licences and vehicles authorised thereunder has been maintained.

*Licences to drive Heavy Goods Vehicles.*

(21) The position at 30th September, 1937, in connection with the licensing of drivers of heavy goods vehicles was as follows:—

Applications outstanding at 30th September, 1936	...	407
Applications received since 30th September, 1936	...	10,104
		10,511
Substantive licences issued	...	8,871
Applications refused	...	81
Applications withdrawn	...	759
Applications outstanding at 30th September, 1937	...	800
Provisional licences issued (1st January, 1937, to 30th September, 1937)	...	2,026

Examiners have conducted 1,712 driving tests as required by Section 31 (5) of the Road Traffic Act, 1934, with the following results:—

Passed first test	...	1,603
Failed first test and subsequently passed	...	28
Failed first and subsequent test	...	81

The percentage of failures to tests carried out is approximately 6·37.

In addition 164 successful driving tests have been conducted by 25 "approved" Examiners employed by 10 large operators.

(22) During the period 1st January to 30th September, 1937, 147 persons already holding licences to drive heavy goods vehicles applied for the amendment of such licences to authorise them to drive additional types of vehicle. Following upon further driving tests practically all these candidates were granted the authorisations sought.

(23) There has not been an appeal to courts of summary jurisdiction in connection with refusals of applications for licences to drive heavy goods vehicles.

*Maintenance of Goods Vehicles.*

(24) During the year the Certifying Officers and Examiners attached to my Area carried out 11,586 examinations of goods vehicles under the powers conferred upon them by Section 17 of the Road and Rail Traffic Act, 1933. These examinations covered 9,327 vehicles, the balance of 2,259 examinations being in connection with second or third inspections of the same vehicles. As a result of these examinations it was found necessary to issue notices of prohibition in 1,428 cases. Of this total number of prohibitions, 471 notices were expressed to take effect immediately, indicating that the vehicles concerned were definitely a source of danger on the road and not fit for service unless and until repairs were effected. The remaining 957 notices were expressed to take effect in anything from one to ten days according to the condition of the vehicles. In all cases of prohibition a follow-up action was taken to ensure that the vehicles concerned were not used on the road until the necessary repairs had been carried out.

(25) In the cases of 1,220 of the vehicles subjected to notices of prohibition, the notices were subsequently withdrawn following satisfactory repairs to the vehicles. It will be seen, however, that in respect of 208 vehicles the prohibition notices were not removed or withdrawn and in each of these cases action was taken by the Certifying Officers or Examiners to ensure that the particular vehicles had either been scrapped or otherwise disposed of. It is worthy of note, therefore, that approximately one in every seven of the vehicles subjected to prohibition notices was in such a state that apparently the owner did not consider it worth while to endeavour to effect repairs.

(26) A review of the position in respect of the examination and prohibition of goods vehicles for the periods covered by this and my two previous Reports is of interest:—

	1934-5.	1935-6.	1936-7.
No. of Examinations ... ..	13,784	13,692	11,586
No. of "delayed" prohibitions...	2,970	1,268	957
	=21.5 per cent.	9.3 per cent.	8.3 per cent.
No. of "immediate" prohibitions	474	510	471
	=3.4 per cent.	3.7 per cent.	4.0 per cent.
Total No. of prohibitions ...	3,444	1,778	1,428
	=24.9 per cent.	13.0 per cent.	12.3 per cent.

(27) Although the period covered by my first Annual Report was longer than the periods covered by the two subsequent Reports, it is apparent that whereas the inspection of goods vehicles under the provision of Section 17 of the Act resulted in an almost immediate material improvement in the standard of maintenance, nevertheless the rate of improvement was not maintained in the latter part of the period reviewed above.

(28) Some 70,000 goods vehicles operate in this Area, however, and only a small proportion of these can be examined in any year. It is accordingly difficult to state with any degree of certainty what is the general standard of vehicle maintenance throughout the Area and it would not be safe to assume on the available data whether the tendency is for the standard to improve or decline. That there is considerable room for improvement is, however, exemplified by the results of a recent comprehensive examination of goods vehicles passing points on certain main roads in North Wales during a 24-hour period. The number of vehicles examined was 230 and of these it was found necessary to subject 34 to "delayed" notices of prohibition and a further 11 to "immediate" notices.

(29) An analysis of vehicle defects recorded on prohibition notices during the year ended 30th September, 1937, has been made and it has been found that the defects which have been mainly responsible for the issue of these notices, in order of frequency, are as under:—

- (i) hand brakes,
- (ii) road springs and shackles,
- (iii) foot brakes,
- (iv) steering.

(30) During the year no operator has exercised the right allowed by Section 17 of the Road and Rail Traffic Act, 1933, to appeal to a Certifying Officer or the Minister in consequence of the refusal of an Examiner or Certifying Officer to remove a prohibition notice.

(31) Arising out of vehicle examination it would appear that the standard of mechanical fitness of vehicles of under 2½ tons unladen weight is lower than that obtaining generally in the case of heavier vehicles, and it is for consideration whether this is due to the tendency to overload this class of vehicle. It has also been observed that in the case of ancillary users maintenance of vehicles is apt to be regarded as of secondary importance and an endeavour has been made, when opportunity offered, to bring to the notice of this class of operator the relative advantages of systematic inspection and overhaul of vehicles as compared with dependence upon running repairs.

(32) It has been found in connection with the examination of vehicles and especially during investigations into accidents that many trailers and trailer couplings are not mechanically sound. In one instance an operator had constructed a number of trailers from parts obtained from scrapped heavy motor cars. On inspection it was found necessary to issue immediate prohibition notices for these trailers and to delay the removal of the notices until considerable reconstruction had taken place. Trailer couplings have frequently been found to be defective or badly worn, with inefficient locking devices fitted to the trailer coupling connecting pins. Owing to the very heavy stresses imposed on trailer couplings when in service the importance of paying particular attention to this component is urged upon operators.

#### *Accidents.*

(33) The investigation of accidents in which goods vehicles were concerned has been regarded as of first importance and in this connection 284 vehicles were examined. Of this number 114 were examined following special reports received from police authorities intimating that mechanical defects in the vehicles concerned constituted a contributory factor to the accident. Certifying Officers have

forwarded to your Department either a formal report or a considered opinion in each case. There is a tendency in certain circumstances following an accident for drivers to blame the condition of the vehicle, but it is fair to record, that when carrying out investigations into accidents reported as being due to mechanical defects in the vehicle it was often found that the accident was not in fact caused by mechanical defects but was due rather to the human element.

*Enforcement.*

(34) The following statement shows the prosecutions undertaken on my behalf during the year:—

Act.	Section.	Offence.	Summonses heard.	Convictions recorded.	Dismissed or withdrawn.
Road Traffic Act, 1930.	Sect. 19 as amended.	Excessive hours of driving or insufficient rest.	1,828	1,677	151
Road and Rail Traffic Act, 1933.	Sect. 1	Using unauthorised vehicle ...	284	282	2
	Sect. 9	Contravening licence conditions:—			
		(a) "C" licence vehicle carrying for hire or reward.	7	7	—
		(b) breach of "A" contract licence conditions.	2	2	—
		(c) failure to maintain vehicles in fit and serviceable condition.	2	2	—
		(d) breach of "B" licence conditions.	31	31	—
		(e) exceeding speed limit.	65	61	4
		(f) excessive hours of driving or insufficient rest.	229	229	—
		(g) failure in relation to the keeping of records.	167	167	—
	Sect. 16 and Regs.	Incomplete or incorrect records; failure to preserve.	1,849	1,749	100
	Sect. 17	Using prohibited vehicle ...	12	12	—
	Sect. 34	(a) Making false statements to obtain a licence.	6	6	—
		(b) Altering drivers' records with intent to deceive.	40	—	*40
		(c) Altering a licence or identity certificate with intent to deceive.	6	6	—
Goods Vehicles (Licences and Prohibitions) Regulations, 1936.	Reg. 12	Identity certificates not applicable to vehicle or failure to display identity certificate.	134	134	—
	Reg. 17	Failure to notify change of address.	5	5	—
	Reg. 21	Failure to notify and surrender licence.	4	4	—
Road Traffic Act, 1934.	Sect. 31	Driving or employing a person to drive a heavy goods vehicle without a licence.	89	86	3
Heavy Goods Vehicles (Drivers' Licences) Regulations, 1936.	Reg. 13	Failure to notify change of address.	1	1	—
			4,761	4,461	300

In respect of the 4,461 convictions recorded, fines (inclusive of costs) amounting to £3,275 were inflicted.

\* These 40 charges relate to one operator; one charge was dismissed—39 withdrawn. On the same facts the operator was convicted on 40 charges for failing to preserve the records in accordance with Section 16 (4).

The above statement does not include those prosecutions undertaken by Police Authorities in the Area without reference to or assistance from my Office.

(35) It has been my practice in respect of reported contraventions to address letters to the alleged offenders setting out the precise nature of the proceedings under consideration. This procedure has afforded the persons concerned an opportunity of rebutting or explaining the charges made against them and has undoubtedly avoided the necessity for proceedings in a large number of cases. It has also enabled me to deal with many offenders by way of warning instead of prosecution. In this connection warning letters have been addressed to 2,154 persons during the year.

(36) It will be seen that there has been a marked increase in the number of prosecutions as compared with the previous year. It is, of course, difficult to base any assumptions upon these figures of convictions because they relate only to cases in which offences have been detected. Generally, I am inclined to the view that there has been some slight improvement in regard to the observance of Section 19, Road Traffic Act, 1930, which relates to the permissible working hours of drivers, but the position is still far from satisfactory.

(37) Considerable attention has been given by the Examiners during the year to the average speeds of heavy goods vehicles over long distances. It has been found in many cases where drivers' records have been checked by the Examiners that although the number of hours worked has been just within the legal limits, the distances covered during the journeys have been such as to involve an average speed for such journeys exceeding 20 miles per hour. The vehicles used for this long distance traffic are usually of a very heavy type carrying big loads and it is obvious that the benefits from a road safety point of view arising from compliance with the law relating to drivers' hours are completely nullified if that compliance is merely the result of having driven the vehicle at excessive speeds for long periods.

(38) Another matter which has caused me some concern is the increase in the falsification of drivers' records. Complaints have been received that certain operators were not observing the provisions of Section 19, Road Traffic Act, 1930, in relation to drivers employed by them. Subsequent examinations of the drivers' records in these cases have failed to reveal any offences. Checks taken upon the road, however, have shown that the records produced by the operators concerned were materially incorrect when compared with the observed movements of the vehicles. The organisation and carrying out of road checks has therefore accounted for an increasing proportion of the Traffic Examiners' activities.

(39) I have observed that during the year magistrates generally have tended to increase the amounts inflicted in fines for offences connected with the operation of goods vehicles, many having expressed great concern at the present widespread disregard for the law. At the same time I must report that there still exists as between various Courts a marked divergence in the penalties imposed for what appear to be offences of equal gravity. It must be admitted that in certain Courts the fines inflicted are so small that it is very doubtful whether they provide an effective deterrent.

(40) Although the major purpose of the provisions in the Road Traffic Act, 1930, relating to drivers' hours, maintenance and loading of vehicles and maximum speeds was to ensure safety upon the road, the observance of the law in these respects has an additional significance since the institution of the licensing procedure under the Road and Rail Traffic Act, 1933. It is clear that if there is to be economic stability in the industry as a whole it must be made impossible for one operator to gain advantage over his competitors by overworking his drivers or otherwise operating his vehicles in a manner not conforming to the law. The importance of strict enforcement in this respect cannot be over-emphasised, because, as I have indicated above, the industry generally consists of very small units including a very large number of one-vehicle operators. I have considered it necessary to mention this aspect of the matter because of the proposal to introduce in the near future legislation for the control of drivers' wages and conditions of service and because there is also a possibility, as envisaged in the recent report of the Transport Advisory Council, of the statutory control of rates. The existence in the industry of a proportion of carriers, however small, who are not disposed to conform to the very elements of fair competition and road safety may seriously endanger the success of any rates scheme.

(41) In concluding this report I have again to record my appreciation of the help and co-operation of the Police Authorities, of the services rendered by the various associations of road operators both to myself and the industry and of the excellent manner in which the staff attached to my Area have performed their duties during the year. I must also express my thanks to the Local Authorities who have assisted my work very materially by providing accommodation for Public Inquiries held in various parts of the Area.

I have the honour to be, Sir,

Your obedient Servant,

W. CHAMBERLAIN,

Licensing Authority.

## WEST MIDLAND TRAFFIC AREA

To the Minister of Transport.

SIR,

1. In pursuance of the provisions of Sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933, I have the honour, as Licensing Authority for the West Midland Traffic Area, to submit my Report for the 12 months ended 30th September, 1937.

During this period, in order that the work might proceed with reasonable despatch, Dr. W. Dawson Sadler, M.A., LL.D., Barrister-at-Law, has continued as found necessary to act as my Deputy in the consideration of applications for Public or Limited Carriers' licences or variations of licences in these categories. A special expression of thanks is due to him for the ready and able assistance he has given me in this work since his appointment in January, 1935.

### *Observance of Conditions attached to Licences and Enforcement of the Acts.*

2. Up to the date of my last Report I had not taken the extreme steps of suspending or revoking licences as a penalty for frequent contravention of the statutory or special conditions attached thereto. During the past year, however, I came to the conclusion that the repetition of offences was so serious as to necessitate the holding of special Public Inquiries in six instances to consider whether I should take action under Section 13 of the 1933 Act in respect to certain carriers' licences. In four of these cases I gave the operators a severe warning as to the possible consequences if they failed to effect improvement. In the fifth instance I ordered the temporary deletion of a vehicle from the licence and in the sixth case I decided to delete from the licence a 6-ton vehicle, authorising in its place one weighing only 2½ tons, in view of the alleged difficulty in conforming to the 20 mile an hour speed limit on heavier vehicles. I also found it necessary to issue warnings under Section 6 (2) (b) of the Act to 20 other operators who were called specially to Inquiries during the year; in one of these cases also a vehicle was deleted from the licence.

In another instance, in view of the applicant's recent record, I refused to add one vehicle to an existing licence, because I considered this licensee should not for the present be granted additional responsibilities.

It may be added that either I or my deputy administered warnings at Public Inquiries in 71 other cases where we did not consider the offences sufficiently serious to warrant revocation or suspension of the licence, whilst in 144 instances I caused letters of warning to be sent to 120 operators.

The reaction of operators to these warning letters has been somewhat varied, a proportion having evinced considerable annoyance whilst others have expressed gratitude at having their notice drawn to matters which needed further attention. In the main they have accepted their responsibilities and expressed willingness to undertake all reasonable measures to secure compliance with their licence conditions.

In my last Report I instanced that amongst the efforts made by certain operators to obviate a recurrence of offences were the fitting of governors or recording apparatus in order to check speeding, and that in order to avoid excess weight upon the rear axles many operators had either changed their vehicles or had fitted additional axles. Several operators during the past year have indicated that with the object of avoiding further offences they have on the one hand instituted a bonus system for freedom from accidents and convictions and, on the other hand, suspended or dismissed drivers for repeated convictions. Many now take adequate steps to control the insurance certificates relating to the vehicles in order to ensure that all convictions are brought to their notice.

Detailed particulars indicating the legal proceedings taken during the year are given in Table I at the end of this Report. It will be observed from this table that the Enforcement staff has not become preoccupied with only one class of offence and that the two main objects of the Act of 1933, namely, public safety and the regulation of competition have both been borne in mind.



In 1,178 of the total of 1,688 cases the proceedings were instituted by me as Licensing Authority, and in the remaining 510 cases, by the Police Authorities. The total of 1,178 represents an increase of 56 per cent. over the corresponding figure in my last Report.

Apart from the figures in the table, the Police Authorities notified me during the year of 4,955 convictions in connection with the services of carriers licensed in my Area. These offences were principally for speeding but as many convictions were not so notified the total number must have been considerably higher.

Although breaches of the law are so numerous I would not have it inferred that commercial vehicle owners are as a rule more prone to lawlessness than other classes of the community; on the contrary, it is evident that the majority appreciate the statutes by which they are governed. These operators, large and small, continue to respond readily to consideration and assistance, and for this reason I have been able to continue the policy of enforcing the Acts as far as possible by way of interview and warning letter, rather than by prosecution.

In cases where an operator has been warned as an alternative to legal proceedings, it is now my general practice to cause an inspection of the preserved records to be made at a later date, and in such cases it is usually found that there has been considerable improvement.

My chief anxiety is with regard to those operators who, for the purposes of gain, continue to infringe the law deliberately. There is still far too large a number of operators and drivers who ignore the limits of hours, speed and weight, and disguise their offences by the falsification of their records. This falsification, as a general rule, destroys the object for which records were intended, and renders them useless for the purpose of enabling me to see whether or not the law has been observed. For this reason, although I have not taken this course during the past year, and still regard the necessity with great reluctance, I fear that in order effectively to check this pernicious practice, there will be no alternative but to take proceedings which may result in imprisonment for these offences.

The liaison between my staff and the Police Authorities has been considerably strengthened during the year with the result that the standard of record-keeping over wide areas which my own staff could visit only at most infrequent intervals, has been considerably raised. Every care has been taken to ensure that the requests made to the Police Authorities have not been such as to interfere with the normal course of their duties, but it is a source of considerable satisfaction to me to be able to record this close co-operation and to state the fact that in no instance has my request for assistance been refused.

#### *Heavy Goods Vehicle Drivers' Licences.*

3. The amending legislation provided by the Road Traffic (Driving Licences) Act, 1936, with regard to temporary licences for learners has been of great assistance to new applicants for licences to drive heavy goods vehicles, and appears to have occasioned a large increase in the number of applications from those who had no statutory claim to such licences. The issue of provisional licences has enabled tests to be carried out on the appropriate class of vehicle and in many cases on the actual vehicle which the applicant is required to drive.

During the year under review the number of applications received, compared with the 4,666 of the previous year, was 5,644. These, together with the 111 applications under consideration on the 30th September, 1936, were disposed of as follows:—

Granted	...	...	...	...	...	...	...	5,111
Withdrawn	...	...	...	...	...	...	...	88
Refused	...	...	...	...	...	...	...	344
Consideration not completed by 30th September, 1937	...	...	...	...	...	...	...	212

The number of driving tests carried out by my Examiners was 765, as compared with 862 of the previous year. The number of applicants passed at the first test was 730; a further 11 passed at a subsequent test. A licence was refused in only 13 cases owing to failure to pass the test.

The number of applicants tested and passed by other persons I have authorised to carry out tests fell from the 423 of last year to 279, of which 273 passed the first test and three passed a subsequent test.

Following the receipt of reports of convictions recorded against the holders of "vocational" licences I have revoked four licences and suspended five others. I have received three applications under Section 31 (8) of the Road Traffic Act, 1934, for reconsideration of my decision to refuse the grant of a licence. In two of these cases I decided to grant, but in the third case my refusal was confirmed.

There have been no appeals to Courts of Summary Jurisdiction by any person aggrieved by my refusal or failure to grant a heavy goods vehicle driver's licence.

#### *Vehicles.*

4. The standard of maintenance of goods vehicles in the West Midland Area continues to improve although there was an increase in the number and percentage of immediate prohibition notices issued by the Certifying Officers and Vehicle Examiners during the year ended 30th September, 1937, as compared with the previous year. During the year 18,953 inspections of goods vehicles were carried out and 2,119 prohibition notices served upon owners, representing 11.18 per cent. of the total examined. Of these notices 442 or 20.8 per cent. were immediate prohibitions and the remaining 1,677 or 79.2 per cent. were delayed.

The fact that since the inception of the goods licensing system no application has been made to have a goods vehicle inspected by the Certifying Officer because the owner was aggrieved by the refusal of an examiner to remove a prohibition, is an indication that operators are not dissatisfied with the examiners' decisions.

The main defects giving rise to prohibitions are in the steering gear, worn joints evoking the most criticism, and defective steering boxes next. Brakes call for almost as much complaint, including the ratchet mechanism of hand brakes, the failure of which makes the vehicle unsafe when parked on a slope. Spring shackles also are commonly neglected. Instances of defective tyres are very rare; even the roughest vehicle is usually well shod. Very few solid tyred vehicles remain in use in this Area and those only on work for which they are specially adapted.

Vehicles used in connection with demolition and building schemes are a source of some anxiety. Second-hand vehicles in indifferent condition are often purchased for this work and are expected to give satisfaction. In fact difficulty is experienced in overcoming the prevalent idea that, because a vehicle is used in arduous conditions, it is reasonable to expect it to be out of repair.

I am glad, however, to report that more systematic maintenance is now in operation by all classes of goods vehicle owners. The increasing institution of such systems is due in a large measure to the efforts of and assistance given by my technical staff. Ancillary users achieve the least satisfactory standard of maintenance, and pressure was brought to bear upon several operators of large fleets during the past year to ensure adequate improvements in their vehicles. In two instances the entire fleet had to be changed.

Vehicles of an unladen weight under 2½ tons are still increasing in popularity, probably on account of the higher speed limit and of the fact that such vehicles are often specified by the makers to be capable of carrying a pay load up to five or six tons, although many instances of extensive overloading have come to light. On the other hand, multi-wheeled vehicles for maximum loads also appear to be on the increase. Dual front axles are now being used and give satisfactory service. Assisted braking is also becoming more universal on both light and heavy vehicles.

A case arose during the year in which the chassis of a well-known make of steam wagon broke in two and accusations as to faulty materials and workmanship were made by the owner of the vehicle. My Certifying Officer subsequently inspected the whole of the operator's fleet and was able to confirm that no structural defect was disclosed, the fracture being due to overloading.

The increase in two-wheeled trailers behind private cars, noted in my last Report, still continues. Loads of at least a ton are often carried on such a trailer, hauled by an indifferent motor car.

#### *Applications for Carriers' Licences.*

5. This Report covers (i) the completion of the licensing procedure in respect of the second currency period of Public Carriers' "A" licences; (ii) the completion of the consideration of applications for Limited Carriers' "B"

licences for a third currency period and a proportion for a fourth period; (iii) the consideration of new applications for licences; (iv) the consideration of applications to vary current licences; and (v) the issue of Private Carriers' "C" licences for the second triennial period.

The disposal of the applications for each class of licence and for the variations of licences received during the year ended 30th September, 1937, is shown in Tables II and III appended to this Report.

Some indication of the increase of traffic and the tendency in the method of movement in the past year, compared with the previous year's activities, is given by the following figures as on 30th June:—

	<i>West Midland Area.</i> <i>Per cent.</i>	<i>All Areas.</i> <i>Per cent.</i>
Number of vehicles authorised to Railway Companies ... ..	+ 17·4	+ 6·2
Number of vehicles authorised to "A" Licence Holders by their "A" licences, excluding Contract licences ... ..	- 2·8	- 3·0
Number of vehicles authorised to "B" Licence Holders by their "B" licences ... ..	+ 5·9	+ 1·8
Number of vehicles authorised to "C" Licence Holders on "C" licences ... ..	+ 14·4	+ 15·0

To illustrate the diversity of those engaged in the carriage of goods by road for hire or reward, I call attention to the fact that, taking the West Midland Traffic Area alone and omitting the Railway Companies, out of the 2,418 holders of Public Carriers' "A" (currency) licences authorising the use of 6,730 motor vehicles with an average of under three vehicles per licence as at 30th June, 1937, there were 1,951 licensees, or about 80 per cent., each with not more than three "A" vehicles and averaging less than a vehicle and a half each, as this portion possessed only 2,836 vehicles; that is, a little over 40 per cent. of the total in this class.

Similarly, in the case of limited carriers licensed in the West Midland Area, the figures are:—total "B" licensees, 3,684; total "B" vehicles, 5,639, giving an average of one and a half vehicles per licence holder, but the number of licensees authorised to use three "B" vehicles or less is 3,493, or 95 per cent., owning 4,399 vehicles, or 78 per cent., of the total vehicles of this class. The total "A" and "B" licensees in this Area with over three vehicles each, other than those held by the Railway Companies, amount to only 658 out of the 6,102, that is, not much over 10 per cent., though they own about 40 per cent. of the vehicles.

These figures are relevant to the consideration of rate control, the Transport Advisory Council's report on which has recently been published. Further, I am given to understand that a large majority of the remaining 5,444 hauliers in the West Midland Area, whether "A" or "B" licensees with three vehicles or less and an average of less than one and a half vehicles each, are not members of any recognised association, and it is, I think, accepted that there should be no compulsion on them to join.

#### *Objections or Representations under Section II (2)*

6. As in previous years, comparatively few representations against the grant of applications were received from road operators, but half of the applications by established public carriers for additional vehicles, two-thirds of the applications by limited carriers to continue with modification, or for variations to their "B" licences, and more than half the applications by intending new operators, produced objections from the London Midland and Scottish and the Great Western Railway Companies. The number of objections lodged by these Companies and by road operators respectively is shown in Table IV.

In all cases, except where the representations were subsequently met or withdrawn, objectors were heard at Public Inquiries.

As already mentioned in paragraph 5, this has been the first year in which the large bulk of Public Carriers' "A" licences has been due for continuation. It is of interest to note that of 1,940 applications received for further licences of this

class without modification, the Railway Companies opposed only 38, that is, less than 2 per cent., as compared with the 12·2 per cent. in the case of licences expiring on 30th September, 1936. The reasons for the objections lodged this year against "A" licences have been mainly:—

(i) Indication by applicants of extended ambit of the vehicles as compared with the original application. In most of these cases the objection was subsequently withdrawn on receipt by the objectors of an assurance that no extension of operations was, in fact, proposed.

(ii) Evidence that a vehicle or vehicles had not been fully employed during the currency of the last licence; and

(iii) That the nature of the traffic carried had changed.

In regard to 2,958 applications for continuation under Limited Carriers' "B" licences without modification, objections were received from the Railway Companies in 54 cases, that is, only 1·8 per cent., as against 24·1 per cent. last year. In these cases the Railway Companies amplified their statutory objections and wherever possible special conditions were agreed by correspondence without recourse to a Public Inquiry. In other cases, it has been necessary to call the applicants to an Inquiry, the main reasons being alleged changes in traffic or non-use of the existing facilities during the previous licence period.

The statutory form of objection now in use has continued to permit concentration on examination of the specific points to which objections were directed. In a number of instances the Railway Companies have continued their practice of corresponding with applicants in regard to doubtful points in their applications, resulting in the withdrawal of a number of objections.

#### *Acquisition of Businesses, Section II (3) (b)*

7. In the majority of applications for "A" or "B" licences to expire not later than the existing licence under which the vehicles to which the application relates are authorised to be used for the purpose of a business which the applicant has acquired or intends to acquire, I have continued to give notice in "Applications and Decisions", unless there is some clear family reason for the change in the licensee. In general, when published, the applications have been considered at a Public Inquiry; where a clear case is established for the continuation of the licence the objectors have not been allowed to make representations.

With the increasing appreciation of the value of Carriers' Licences, however, it becomes more than ever necessary to pay special attention to cases where it appears likely there is no substantial business to be taken over or where the so-called purchaser is desirous of obtaining additional vehicles for other work without having to prove the need in the normal manner.

Amalgamations have taken place mainly between businesses already financially controlled by one group, or financially associated with another.

A noticeable proportion of the applications under Section II (3) (b) was consequential upon the formation of limited liability companies to succeed to individual businesses or partnerships.

#### *Public Carriers' Licences.*

8. The following are the numbers of motor vehicles authorised under Public "A" Carriers' licences (excluding Contract "A" licences but including Short-term licences) on 30th April, 1936, and 30th June, 1937:—

<i>Date.</i>	<i>Railway Companies.</i>	<i>Others.</i>	<i>Total.</i>
30th April, 1936 ... ..	956	6,921	7,877
30th June, 1937 ... ..	1,119	6,730	7,849

These figures indicate an increase since April, 1936, of 17·1 per cent. in "A" class motor vehicles authorised for use by Railway Companies and a decrease during the same period of 2·8 per cent. in the number sanctioned for use by road operators, including the road companies controlled by the Railway Companies. The continued increase in the number of motor vehicles authorised to the Railway Companies is due largely to the provision of additional collection and delivery facilities and their continued policy of replacing horse teams, but a considerable number has also been justified by an increase in the figures of railway traffic which has continued to expand throughout the year.

My last Report referred to the fact that the addition of road vehicles available for competition with the Railways had not been entirely arrested, but the position is now such that it is usually possible for the number of vehicles to be assessed in relation to the needs of the industry.

In the West Midland Traffic Area on 30th June, 1937, excluding 401 holders of 500 Contract "A" licences there were 2,421 holders of 2,573 Public Carriers' licences, representing 37 per cent. of the total number of operators in the Area authorised to carry goods for hire or reward, including Contract licence holders. The number of holders of Contract "A" licences who also hold Public Carriers' "A" licences was 185, as compared with 119 on 30th April, 1936.

Excluding the Railway Companies, 2,418 holders of Public Carriers' "A" (currency) licences operated 6,730 motor vehicles. Of this number three did not own any motor vehicles, being authorised only to use hired vehicles or trailers, 1,269 owned one motor vehicle, 470 owned two motor vehicles, 209 owned three motor vehicles, and 125 owned four motor vehicles. Thus the number of public carriers operating four motor vehicles or less authorised under Public Carriers' licences was 2,076, whilst the number operating more than four motor vehicles was 342 or only 14.1 per cent. of the total number of Public Carriers in the West Midland Traffic Area, excluding Railway Companies. The average number of motor vehicles in possession per licensee was 2.8.

#### *Contract "A" Licences. Section 7 (1).*

9. The number of holders of this class of licence on 30th June, 1937, was 401, authorising 777 vehicles and trailers, representing an increase of 186 vehicles since 30th September, 1936, and an increase of 511 vehicles since 30th September, 1935, but the growth in the number of these vehicles is relatively small compared with the increase in "C" vehicles to which they are the alternative. On the same date 316 traders had contract arrangements with one operator, 46 with two operators, eight with three and eight with four or more, two of the last mentioned being with no less than nine hauliers. It is interesting to note that excluding trailers there were on 30th September, 1937, 277 Contract licence holders operating one vehicle on contract, 85 operating two vehicles, 27 operating three vehicles and 43 operating four or more vehicles.

On 30th June, 1937, Contract licences were held by 1.78 per cent. of all licence holders in my Area, a larger percentage than in any other Traffic Area.

During this year, due to the comparative ease with which Contract licences may be obtained and a constantly growing knowledge as to those facilities, there has been a consistent increase in the number of such licences sought. It was anticipated that the unsatisfactory service provided by those holders of Contract licences who secured the work by quoting uneconomical rates would lead in course of time to patronage of the services provided by rail or of the road services provided by reputable road operators. No facts are available to show whether this has materialised so far, but the increase in the number of Contract "A" licence holders would appear to suggest that any tendency in this direction is more than offset by further recruits to this category.

#### *Limited Carriers' Licences.*

10. The number of motor vehicles authorised in Limited Carriers' "B" licences on 30th April, 1936, was 5,326; and on 30th June, 1937, 5,639, representing an increase of 313 motor vehicles, or 5.9 per cent. since April, 1936.

On 30th June, 1937, there were 3,684 holders of 3,856 Limited Carriers' "B" licences, representing 56 per cent. of the total number of operators authorised in my Area to carry goods for hire or reward. Of this number 23 owned no motor vehicle, being authorised only to use hired vehicles or trailers, 2,723 owned one motor vehicle, 565 owned two motor vehicles, 182 owned three motor vehicles and 72 owned four motor vehicles. The number of Limited Carriers operating four motor vehicles or less authorised under Limited Carriers' "B" licences was thus 3,565, whilst the number operating more than four motor vehicles was 119, or only 3.2 per cent. of the total number of Limited Carriers in the West Midland Area. The average number of motor vehicles in possession per licensee of this class at the same date was 1.5.

All Limited Carriers' licences have been dealt with for the third currency period and about 800 applications to continue had by 30th September, 1937, come under review, as the first two months' quota, for the fourth currency period.

As I anticipated last year, the number of opposed applications for licences to continue without modification for the third currency period fell considerably.

Many limited carriers hold more than one "B" licence, due to differing conditions applicable to different vehicles. As the condition to be attached must be reasonable in accordance with the evidence adduced, the exercise of discretion by a Licensing Authority to attach one simple condition appropriate to all the vehicles specified in the licence is likely to become fettered. There is therefore a growing tendency towards multiplication of licences held by one operator, a tendency between objector and applicant to bargain, and an absence of flexibility and economic working in the fleet of the operator. Generally speaking, I do not favour this procedure as it tends to weaken the control of the Licensing Authority over the field of operation of "B" licensees.

During the last year I have, where possible, carried out my intention to simplify some of the special conditions attached to a number of licences of this class in order to facilitate both the enforcement of those conditions and the administrative work.

The figures quoted in my last Report relating to the classes of goods authorised to be carried for hire or reward by holders of "B" licences have not altered materially except that the number of operators authorised to carry for specified customers only has increased by about 25 per cent. There is also generally little change in the nature of the business other than hauling carried on by "B" licence holders. The most remarkable alteration is the relatively large increase in the number of Limited Carriers who carry on no other trade or business, an increase from 86 as at 30th September, 1936, to the present figure of 313. This increase is due largely to the tendency on the part of operators to seek Limited Carriers' licences for local haulage work with a view to reducing or avoiding possible objection and to some extent to the fact that the licensees are so busy with haulage for hire or reward that they have abandoned their other activities.

#### *Private Carriers' Licences.*

11. The number of vehicles authorised under Private Carriers' "C" licences has increased from 26,244 on 30th September, 1935, to 31,810 on 30th June, 1937, representing an increase of 21.2 per cent. in less than two years. A large proportion of this increase was doubtless due to the legislation effective from June, 1936, which required all vehicles authorised under "C" licences to be identified by means of an identity certificate. On 30th June, 1937, the "C" licence holders constituted 71.17 per cent. of the total licence holders of all classes in this Area, a smaller percentage than in any other Traffic Area.

In spite of the adequate advance notice issued from my office of the impending expiry of the licences expressed to take effect to the last day of June, July, August and September, 1937, over 1,000 operators failed either to apply for new licences before the expiry date of the old licence or to indicate their intentions in any way. They were accordingly again reminded as to their responsibilities in the matter verbally, and in writing, by my staff, working in collaboration with the various Police Authorities. In the main they have now advised me as to their intentions and appropriate steps are being taken in regard to the remainder to ensure the observance of the law.

A number of holders of Private Carriers' "C" licences indicated that the vehicles specified in those licences were registered as Agricultural vehicles under the Finance Acts, and a further Carrier's licence was consequently not required. The original licences in such cases were doubtless sought when a general state of ignorance prevailed in regard to the special position of this class of vehicle.

#### *Variation of Current Carriers' Licences of All Classes.*

12. During the year 2,194 variations of Public Carriers' licences, 236 variations of Contract licences and 1,725 variations of Limited Carriers' licences were granted. The tendency for licence holders to replace vehicles by others of greater unladen weight continues, a large majority of these increases being due to heavier construction, e.g. the substitution of mechanical for hand tipping gear, the use of twin rear wheels, higher sides, heavier engines, reinforced chassis, etc.

It has continued to be my practice to facilitate as far as possible the replacement of vehicles so that the owners should not be involved in unnecessary

expenditure on worn-out vehicles. I have continued to give immediate authority under Section 11 (3) (c) of the Act in regard to replacement of vehicles by others of greater unladen weight where the increases appeared reasonable having regard to the foregoing factors and to the nature of the traffic. In the case of Limited Carriers, I have continued also to have regard to the proportion of goods stated to be carried for hire or reward and in connection with the applicant's trade or business.

As a general rule, both "A" and "B" operators now confine their applications to their actual requirements, and invite such conditions as may eliminate, as far as possible, objections from other transport interests.

During the year 6,793 variations of Private Carriers' licences have been issued. Authority to effect replacements of vehicles authorised under "C" licences has always been given expeditiously. Considerable unnecessary work is created by the failure of operators to forward with their applications the licence and identity certificate relative to the displaced vehicle, and by the submission of unrequired or incorrect fees.

#### *Temporary Replacement of Vehicles.*

13. A marked increase is apparent in the number of operators who took advantage of the provisions of Article 15 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936, there having been 127 applications for the substitution of vehicles whilst authorised vehicles were under repair during the year, as compared with a figure of 32 for last year. Small operators, however, have difficulty in availing themselves of these facilities owing to inability to secure the temporary use of a suitable vehicle.

#### *Evidence at Public Inquiries.*

14. During the past year, both applicants and objectors have realised more fully the necessity of detailed evidence. As previously, all applicants for new licences, continuation licences with modification and variations involving additional tonnage or increased facilities, have been advised in advance by letter as to the type of evidence required, with the result that the average applicant attending a Public Inquiry is now better equipped with evidence. There is still a tendency on the part of a minority of operators not to instruct their advocates until just before the Inquiry, but it is becoming generally accepted that the presentation of applications is a matter in which the applicant would be well advised to secure assistance. There is still a pronounced tendency for applicants to rely on letters written in support of applications instead of procuring the attendance of witnesses. Some firms requiring transport are very ready to supply letters to potential licence holders for production at Public Inquiries but unwilling to attend to give their evidence of need in person. The unreliability of such evidence can be gauged from the fact that in one case this year I ascertained that a customer who wrote a supporting letter was not even aware whether the applicant was asking for an additional vehicle or an increased radius. I discovered, also, that one Association was supplying draft letters to applicants' customers; such an arrangement inevitably creates suspicion as to the authenticity of the evidence submitted.

#### *Public Inquiries.*

15. During the period under review 129 Public Inquiries have been held in my Area for the purpose of considering applications for licences and variations thereof. These Inquiries have occupied 135 days compared with 159 days in the previous year.

Inquiries have been held at various centres, as follows:—

	1936-7.	1935-6.
Birmingham ... ..	86	89
Hanley ... ..	18	28
Coventry ... ..	9	14
Shrewsbury ... ..	9	12 (Shrewsbury and Wellington).
Worcester ... ..	7	13 (Worcester and Hereford).
<b>Total ... ..</b>	<b>129</b>	<b>156</b>



The tendency for contested cases to become more complicated has persisted during the past year, with the result that it has been necessary to reduce the number of applications allotted to each Inquiry.

During the year 1,651 applications for licences or variations thereof were listed for hearing, that is an average of 12.2 applications a day, compared with 3,242 applications at the rate of 20 a day last year. Objections were lodged in 1,188 of the 1,651 cases and taken into consideration in arriving at the decisions.

*The Licensing Authority's reasons in writing under Section 6 (3) and Appeals under Section 15 of the Act.*

16. During the period under review, excluding cases in which an appeal followed, seven applicants have asked for reasons in writing for the decision on their application. The number of appeals lodged during the period was eight, of which three were withdrawn, leaving five for decision by the Appeal Tribunal. Two of these were lodged by Messrs. McNamara & Company (1921), Limited, in respect of certain vehicles applied for under an "A" licence, with the London Midland and Scottish and Great Western Railway Companies as respondents. An Order has now been made granting all the vehicles for which application was made by this road company.

The three cases not yet decided are: one appeal by a public carrier for an "A" licence in respect of three units, which I disallowed on the ground that they were required for only one customer, one appeal by a railway company against the authorisation of an additional vehicle as a short-term variation under a Limited Carrier's licence which no longer has effect, and the remaining appeal is against the refusal of a Limited Carrier's licence.

*Conclusion.*

17. In paragraph 2 above I have already expressed my appreciation of the assistance I have received from the Police throughout my Area; I should like to take this opportunity to express my thanks also for the help received from other officers of the Local Authorities who have facilitated my work in many ways, including placing accommodation at my disposal for public inquiries.

I appreciate also the help I have received from legal representatives as well as from officials of the various organisations concerned in the goods transport industry.

In concluding my Report I desire to express my sincere thanks for the assistance I have received from officers of the Ministry of Transport and my appreciation of the loyal service of the Area office staff under my Clerk provided by your Department to assist me in the administration of the licensing work in my Area. Mutual trust has been engendered between the staff and the Industry and I have received many appreciations of the assistance rendered by the senior members of the staff both in the course of their official duties and also out of office hours at informal meetings.

In like manner my thanks are due to the technical staff so ably headed by the two Certifying Officers appointed to the West Midland Traffic Area.

I have the honour to be, Sir,

Your obedient servant,

A. S. REDMAN (Col.),  
Licensing Authority.



TABLE I.—*Prosecutions.*

Act and Section ; or Regulation.	No. of Summonses.	No. of Convictions.	No. Withdrawn.	No. Dismissed.		Pending.
				First offence	Other dismissals	
<i>Road and Rail Traffic Act, 1933:—</i> Sec. 1. Using a goods vehicle, no Carrier's licence ... ..	210	185	1	23	1	26
Sec. 9. Failing to comply with a condition of a licence in respect of :—						
(a) Maintenance of vehicle ...	13	13	—	—	—	7
(b) Hours of drivers ... ..	62	49	9	3	1	3
(c) Keeping of Records ... ..	248	207	6	27	8	11
(d) Special Conditions, " B " Licences ... ..	31	30	—	1	—	3
(e) Use of " C " licensed vehicle for hire or reward ... ..	14	13	—	—	1	—
(f) Use of " A " licensed vehicle for own goods ... ..	1	1	—	—	—	—
(g) Special Conditions, " A " Contract licences ... ..	9	9	—	—	—	—
(h) Speed of authorised vehicles	2	1	—	1	—	2
Sec. 16. Records—failing to keep or cause to be kept ... ..	39	36	—	2	1	6
Sec. 17. Use of prohibited vehicle	16	8	—	8	—	—
Sec. 18. Failing to produce a record	11	11	—	—	—	1
Sec. 34.						
(a) Using Identity Certificate—intent to deceive ... ..	6	6	—	—	—	2
(b) Altering Identity Certificate—intent to deceive ... ..	2	2	—	—	—	—
(c) Altering a record—intent to deceive ... ..	6	3	2	1	—	1
Road Traffic Act, 1930. Sec. 19.						
(a) Cause or permit driving excess hours, or cause or permit failure to have rest ... ..	47	32	3	10	2	—
(b) Driving excess hours, or failing to have rest ... ..	117	84	11	20	2	2
Road Traffic Act, 1934. Sec. 31.						
(a) Employing unlicensed H.G.V. driver ... ..	25	24	—	1	—	2
(b) Driving H.G.V. not so licensed ... ..	12	12	—	—	—	2
The Goods Vehicles (Keeping of Records) Regulations, 1935 ...	523	469	6	39	9	22
The Goods Vehicles (Licences and Prohibitions) Regulations, 1936	80	68	—	12	—	3
The Motor Vehicles (Construction and Use) Regulations, 1931 and 1937 ... ..	212	202	1	7	2	7
The Heavy Goods Vehicles (Drivers' Licences) Regulations, 1936 ... ..	2	2	—	—	—	1
Totals ... ..	1,688	1,467	39	155	27*	101

\* Includes 16 Informations laid as alternatives in one case.

TABLE II.—Applications for Carriers' Licences.

Nature of Application.	Applications outstanding on Oct. 1st, 1936.	Applications received during the year.	Applications disposed of during the year.		
			With-drawn.	Granted.	Refused.
" A " Licences :—					
Currency Period ... ..	195	2,455	81	2,492	43
Short Term, Section 3 (3) ... ..	1	11	—	10	—
Contract ... ..	—	385	—	383	—
" B " Licences :—					
Currency Period ... ..	314	3,995	87	3,776	109
Short Term, Section 3 (3) ... ..	3	22	—	24	—
" C " Licences :—					
Currency Period ... ..	46	10,325	—	10,321	—
Short Term, Section 3 (3) ... ..	—	57	—	57	—

	" A "	" B "	" C "
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with :—			
Published ... ..	—	—	—
Not published ... ..	1	—	27
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were considered :—			
Without publication ... ..	25	20	—
After publication ... ..	74	42	—
Short Term Administrative Licences issued (Section 3 (4)) ...	96	110	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2)) and Regulation 15 of the Licences and Prohibitions Regulations ... ..	102	25	—

Nature of Variation.	Applications outstanding on Oct. 1st, 1936.	Applications received during the year.	Applications disposed of during the year.		
			With-drawn.	Granted.	Refused.
Variations relating to Vehicles.					
" A " Licences :—					
Published and dealt with at Inquiry... ..	27	2,285	38	112	34
Published but determined without Inquiry ... ..			—	89	—
Not published ... ..			4	1,993	—
" B " Licences :—					
Published and dealt with at Inquiry... ..	33	1,876	37	164	76
Published but determined without Inquiry ... ..			—	105	—
Not published ... ..			6	1,456	—
Variations of Conditions attached to " B " Licences ... ..	5	87	6	49	25

The total number of holders of licences of all classes on 30th June, 1937, was 22,565, as compared with a figure of 20,424 on 30th April, 1936. These 22,565 operators held licences in respect of 47,036 vehicles as compared with a figure of 42,322 on 30th April, 1936.

TABLE III.—Goods Vehicle Licensing.

Number of Licences of each class, number of vehicles authorised thereunder, and average number of vehicles per licence in the West Midland Traffic Area at 30th June, 1937.

	" A " Licences (including Short Term).			" A " Contract.			" B " Licences (including Short Term).*	" C " Licences (including Short Term).*	All Licences.		
	Railway Cos.	Others.	Total.	Railway Cos.	Others.	Total.	Others.	Others.	Railway Cos.	Others.	Total.
No. of Licences ... ..	123	2,450	2,573	1	499	500	3,856	16,060	124	22,865	22,989
No. of Vehicles authorised :—											
(i) Motor Vehicles in possession ... ..	1,119	6,730	7,849	1	748	749	5,639	30,600	1,120	43,717	44,837
(ii) Motor Vehicles to be hired ... ..	6	16	22	—	—	—	24	151	6	191	197
(iii) Trailers in possession or to be hired ... ..	473	373	846	—	28	28	69	703	473	1,173	1,646
(iv) Trade Plates ... ..	—	—	—	—	—	—	—	356	—	356	356
Total No. of Vehicles ... ..	1,598	7,119	8,717	1	776	777	5,732	31,810	1,599	45,437	47,036
Average No. of Motor Vehicles in possession per Licence at 30th June 1937 ... ..	9.10	2.75	3.05	1.00	1.50	1.50	1.46	1.91	9.03	1.91	1.95
<i>Figures as at 30th April 1936 for comparison</i> ...	Total Vehicles ...		8,691	—	—	422	5,419	27,790	—	—	42,322
	Vehicles per Licence		2.97	—	—	1.45	1.48	1.93	—	—	1.98

\* The Railway Companies held no " B " or " C " Licences.

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TABLE IV.—*Objections.*

Classes of Application.	No. of Applications Published.	No. objected to by Rly. Companies.	Percentage.	No. objected to by Road Operators.	Percentage.
<b>" A " Licences.</b>					
First Application ... ..	198	113	57.0	11	5.5
Continuation with modification	240	93	38.7	17	7.0
Continuation without modification	1,940	38	1.9	2	0.1
Variations... ..	260	160	61.5	11	4.2
<b>" B " Licences.</b>					
First application ... ..	602	317	52.6	42	6.9
Continuation with modification ...	293	179	61.0	3	1.0
Continuation without modification	2,958	54	1.8	1	—
Variations ... ..	385	247	64.1	11	2.8

## EAST MIDLAND TRAFFIC AREA

To the Minister of Transport.

SIR,

In accordance with Section 23 (4) of the Road and Rail Traffic Act, 1933, I have the honour to make to you my third Annual Report, as Licensing Authority for the East Midland Traffic Area, established under Section 4 of that Act.

The report covers the period 1st October, 1936, to 30th September, 1937.

### *Public Inquiries.*

1. Sixty-three Public Inquiries (covering 65 days) were held during the year at the following towns:—

Nottingham ...	...	...	...	...	...	...	...	23
Lincoln ...	...	...	...	...	...	...	...	13
Leicester ...	...	...	...	...	...	...	...	12
Northampton ...	...	...	...	...	...	...	...	6
Oxford ...	...	...	...	...	...	...	...	6
Skegness ...	...	...	...	...	...	...	...	2
Derby ...	...	...	...	...	...	...	...	1

The majority of applications dealt with at these Inquiries were applications against which objections had been lodged. In certain other cases it was thought necessary and desirable to set down applications for Public Inquiries although no objections had been lodged. For example, in many cases licensees applied for vehicles which had not been taxed to be included in their renewal licences, and these cases were always investigated at an Inquiry. In cases where it was found that vehicles were in a poor condition, that their maintenance was unsatisfactory, or that breaches of the licence conditions had occurred which could not be regarded as trivial, the holder of the licence was called to an Inquiry for an explanation, and where necessary reprimanded.

Applications for the "transfer of businesses" which had not been published in "Applications and Decisions", but in respect of which further information was required to satisfy me as to the bona fides of the transaction, were also dealt with at Inquiries.

A not unimportant feature in dealing with these unopposed applications at Public Inquiries has been that all interested persons at the Inquiries could see how the Act was being administered.

One Public Inquiry was held for the purpose of considering the suspension of a Contract "A" licence owing to its misuse. After hearing the evidence I suspended the licence for a month.

In addition to the Public Inquiries a number of Conferences were held in various parts of the Area with a view to making better known the provisions of the Act and in particular the requirements of the law regarding drivers' hours.

### *Applications for Carriers' Licences.*

2. Particulars of applications for carriers' licences and variations received during the year under review and their subsequent disposal are given in the Schedule below.

In order to complete the spreadover of expiry dates of "A" and "B" licences for future years, 832 class "A" and 169 class "B" Short Term Administrative Licences were issued.

Although a number of applications is shown in the Schedule as outstanding, the determination of applications and the issue of licences is right up to date.

In comparing the figures representing applications for licences with those of the previous year, it will be seen that about four times as many applications for "A" licences were received in 1936-37 as in 1935-36, due to the incidence of the renewal dates, whereas the applications for "B" licences dropped from 3,790 in 1935-36 to 3,388 in 1936-37, largely owing to a change of renewal date for purposes of a better spreadover. Applications for "C" licences rose from 2,353 to 8,547 owing to the expiration of the first currency period of these licences.

Nature of application.	Applications outstanding at 30 Sept., 1936.	Applications received up to 30 Sept., 1937.	Applications disposed of during the period 1 Oct. 1936 to 30 Sept. 1937.		
			Withdrawn.	Granted.	Refused.
<b>"A" Licences :—</b>					
Currency { New ... ..	9	155	27	113	16
Period { Renewal ... ..	82	1,721	22	1,713	11
Short Term, Section 3 (3) ...	3	16	2	13	—
Contract { New ... ..	—	193	1	188	4
{ Renewal ... ..	—	69	1	65	1
Total ... ..	94 **	2,154	53	2,092	32
<b>"B" Licences :—</b>					
Currency { New ... ..	48	360	63	259	44
Period { Renewal ... ..	400	3,000	22	3,099	8
Short Term, Section 3 (3) ...	1	28	3	19	—
Total ... ..	449	3,388	88	3,377	52
<b>"C" Licences :—</b>					
Currency { New ... ..	19	2,256	—	2,275	—
Period { Renewal ... ..	—	6,201	—	6,201	—
Short Term ... ..	—	90	—	90	—
Total ... ..	19	8,547	—	8,566	—

	A.	B.	C.
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with...	5	—	4
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) applied and which were dealt with without publication ... ..	85	65	—
Short Term Administrative Licences issued (Sec. 3 (4)) ... ..	832	169	—
Short Term Licences issued (Reg. 15 Licences and Prohibitions Regulations) ... ..	79	27	—

*Applications for Variations of Carriers' Licences.*

Nature of variation.	Applications outstanding at 30 Sept., 1936.	Applications received up to 30 Sept., 1937.	Applications disposed of during the period 1 Oct. 1936 to 30 Sept., 1937.		
			Withdrawn.	Granted.	Refused.
<b>Variations relating to Vehicles</b>					
<b>"A" Licences :—</b>					
Published and dealt with at Inquiry ... ..	62	1,582	60	148	27
Determined without Inquiry Sec. 11 (3) (c) ... ..			4	700	—
Not published (Section 11 (3) (a)) ... ..			—	660	—
<b>"B" Licences :—</b>					
Published and dealt with at Inquiry ... ..	25	1,277	16	112	18
Determined without Inquiry Sec. 11 (3) (c) ... ..			2	736	—
Not published (Section 11 (3) (a)) ... ..			—	404	—
<b>Variations of Conditions attached to "B" Licences...</b>	28	109	26	74	25

Applications for short term licences to allow of the temporary replacement of authorised vehicles show a tendency to increase, but they are still far fewer than was expected.

Applications for variations show little difference in the year under review compared with the previous year. 330 additional vehicles and trailers were authorised on "A" licences, 84 of this number being granted to three railway companies. 102 vehicles were added to "B" licences.

"Newcomers" to the industry who desired "A" licences found themselves in great difficulty in producing the evidence indicated as necessary by the Appeal Tribunal, only one candidate out of 29 being successful, and all he desired was to use a trailer behind his private car! New aspirants for "B" licences were more fortunate, providing their requirements as regards the classes of goods to be carried and the radius specified were not too ambitious. Out of 275 applicants, 173 were granted licences. A number of these were, however, merely replacing horses by motors.

I have continued to publish in my issue of "Applications and Decisions" a summary of the evidence required to be presented to me by applicants to make out a *prima facie* case in each type of application. This has proved very useful to all parties, as well as making for expedition at the Inquiries, but I did have some difficulty with an applicant for a renewal of his licence whose vehicle had been prohibited, whose driver's records were lost, who did not know the name of his chief customer and whose knowledge of receipts seemed limited to the pocket money his wife allowed him.

One Contract "A" licence was revoked during the year, and the renewal of an "A" licence was refused on the grounds of the previous conduct of the applicant as a carrier of goods. This last mentioned applicant appealed but my decision was upheld by the Tribunal.

In another case I refused to grant five out of seven vehicles applied for on a "B" licence owing to the unsatisfactory manner in which they were being maintained.

As usual a number of applications were received just before Christmas asking that vehicles licensed under a "C" licence might be permitted to be used for hire or reward under contract with the Postmaster General for the carriage of mails. Twenty-seven applications for the use of 32 vehicles were received and granted by virtue of section 2 (4).

#### *Objections.*

3. During the year the majority of class "A" licence holders have had their licences renewed for the first time. Some apprehension was felt by operators as to the procedure which the Railway Companies would adopt in regard to these applications. The four Railway Companies stated that their policy would be that as a general rule applications for renewals "without modification" would not be opposed unless the applicant operated a trunk service.

This procedure was followed, and in the case of the application by Bouts-Tillotson Limited in another Area a hotly contested Inquiry ensued which resulted in an Appeal. Whilst this case was under appeal the London and North Eastern Railway Company asked me to hold in abeyance the hearing of similar applications in this Traffic Area, and eventually when they were asked to specify which applications they intended to oppose, only one operator was named.

The decision of the Tribunal was eventually given on the Bouts case and this decision caused the Railway Companies not to oppose similar applications in this Area.

In cases, however, where a haulier operates a service competitive with the Railway and has applied for additional vehicles, he has been strenuously opposed.

Applications for the renewal of class "B" licences have also been dealt with, and the Railway Companies have not opposed applications for continuation "without modification", except in a few cases.

Of the applications for the renewal of "A" licences "without modification", only 3 per cent. were opposed; whereas 62 per cent. of those "with modification" received objection.

The figures for class "B" licences were 3.7 per cent. in cases of applications "without modification" and 67 per cent. in cases "with modification".

Sixty-six per cent. of the applications for the variation of class "A" licences were opposed and 72 per cent. in the case of variations of class "B" licences.

Of applications for new "A" licences (i.e. newcomers and transfer of business) 65 per cent. were opposed and the figure for applications for "B" licences was 74 per cent.

Although the great majority of objections were lodged by the Railway Companies, there is an increasing number of objections being lodged by rival road operators.

Of objections lodged the following were the percentages pursued at Public Inquiries; the remainder being withdrawn before the hearing:—

*"A" Licences.*

	<i>Per cent.</i>
New and "takeovers" ... ..	70·7
Variations ... ..	80·0
Continuations ... ..	86·5

*"B" Licences.*

New and "takeovers" ... ..	78·8
Variations ... ..	81·5
Continuations ... ..	81·5

*Appeals under Section 15 of the Act.*

4. Nine of my decisions were appealed against. Of these two were in respect of the grant of licences; one was allowed and no decision has yet been given on the other case.

Two were in respect of the grant of a variation and these Appeals were allowed.

One Appeal was against the grant of a Short Term Licence which was dismissed.

One Appeal was lodged against the refusal to grant a new class "B" licence but was subsequently withdrawn, and one Appeal was lodged against the refusal to grant a licence in continuation of an existing licence, and this was dismissed.

The remaining two Appeals were against the decisions to refuse variations of licences, one of which was withdrawn and the other has not yet been decided.

In the cases of Appeals against the grant of licences and variations all the Appellants were Railway Companies. In other cases the Appellants were the applicant hauliers.

*"Transfers" and Surrenders of Licences.*

5. *Class "A".*

253 Holders surrendered their licences. Of these  
113 sold their businesses and new licences were granted to the purchasers.  
140 gave up business owing to their vehicles being scrapped or taken back by Finance Companies.

*Class "B".*

248 holders surrendered their licences. Of these  
53 took out "C" licences instead.  
95 sold their businesses and new licences were granted to the purchasers.  
100 gave up business.

The majority of "C" licences were renewed for the first time. Six thousand three hundred and thirty-eight licences expired on 30th June, 1937, and 750 (or 12 per cent.) holders had failed to apply for a new licence at that date. It was ascertained later that 532 of these had disposed of their vehicles and given up business.

Forty-two vehicles specified in "C" licences have been replaced by private cars and trailers and eight by private cars.

Twenty-three vehicles owned by farmers were found to be taxed at the special agricultural rate.

During the year 78 farmers took out "C" licences for their vehicles for the first time.



*Licence Holders at 30th June, 1937, compared with 30th April, 1936.*

6. The total number of licence holders had increased by nearly 1,000 (approximately 5 per cent.). This increase was accounted for mainly by "C" licences, a slight decrease on "A" currency licences being offset by a corresponding increase on "A" Contract licences. The failure of a large number of "C" licence holders to take out fresh licences effective from the 1st July, 1937, mentioned in the preceding paragraph must be set off against the increase recorded at 30th June, 1937.

Of the 1,886 operators (other than Railway Companies) holding "A" licences 1,024 or 54 per cent. have only one motor vehicle on an "A" licence, while 883 or 47 per cent. have only one motor vehicle at all; 1,638 or 87 per cent. have less than 5 motor vehicles on an "A" licence, and 1,557 or 83 per cent. have less than 5 in all. Two large operators have about 50 motor vehicles each on an "A" licence.

Of the 3,079 operators (no Railway Companies hold "B" licences) holding "B" licences 2,330 or 76 per cent. have only one motor vehicle on a "B" licence, while 1,944 or 63 per cent. have only one motor vehicle at all; 2,994 or 97 per cent. have less than 5 motor vehicles on a "B" licence, and 2,841 or 92 per cent. have less than 5 in all. The two largest operators in this section have each about 20 motor vehicles on a "B" licence.

The following statement shows the number of licences current in 1937 compared with 1936, and the number of vehicles authorised thereon:—

	Licences.		Vehicles.		Average Number of Vehicles per Licence.	
	1937.	1936.	1937.	1936.	1937.	1936.
"A" Licences—Railway Cos.	3	3	972	843	324.00	281.00
Others ...	1,906	2,027	5,236	5,282	2.75	2.60
"A" Contract—Railway Cos.	1	1	1	1	1.00	1.00
Others ...	325	202	499	300	1.54	1.48
"B" Licences—Railway Cos.	—	—	—	—	—	—
Others ...	3,085	3,128	4,574	4,592	1.48	1.47
"C" Licences—Railway Cos.	—	—	—	—	—	—
Others ...	14,565	13,395	28,749	26,201	1.97	1.96
Total—Railway Cos. ...	4	4	973	848	243.25	212.00
Others ...	19,881	18,752	39,058	36,371	1.96	1.94

It will be observed that while there has been a decrease of about 6 per cent. in the number of "A" licences held by operators other than railway companies there has not been so large a decrease in the number of vehicles licensed, so that the average per licence has risen from 2.60 to 2.75.

Contract "A" licences have risen by 61 per cent., while "B" licences show little variation. The number of "C" licences show rather a sharp increase, having risen by 9 per cent., some of which is accounted for by the institution of identification discs for "C" vehicles.

The Railway Companies have increased the number of their licensed vehicles by about 15 per cent. (129 vehicles).

*"B" Licences—Conditions and Business of Holders.*

7. On the 3,085 "B" licences issued there are 5,328 conditions. An analysis of these shows that 57 per cent. limit the carrying of goods within a radius of 30 miles, 70 per cent. within 50 miles, while only 6½ per cent. allow the carriage of goods over 100 miles.

With regard to the commodities to be carried 2,139 may carry General Goods, 715 Furniture and Household Effects, 562 Goods for Specified Customers, 530 Building and Road Making Materials, 464 Coal and Coke, 265 Farm Produce, and 181 Livestock. There has been no change in general radius to which these commodities can be carried from that indicated in last year's report.

Of the businesses carried on by the 3,079 holders of the 3,085 "B" licences, 1,518 or about 50 per cent. are Coal Merchants, 266 are Farmers, 164 are Builders, 96 are Furnishers, 94 are Garage Proprietors and 92 are Greengrocers, while 148 have no other business. This latter figure compares with 122 in 1936.

*Maintenance of Vehicles.*

8. Maintenance is steadily improving, chiefly because
- (a) I insist on goods vehicles being kept roadworthy;
  - (b) licence holders are beginning to understand that their licences will be jeopardized unless a satisfactory report on the authorised vehicles has been made;
  - (c) of the practice of instituting proceedings in cases of dangerous vehicles discovered on the road, where this seems warranted.

One operator found it necessary, as a result of the attention of one of my Vehicle Examiners, to replace the whole of his fleet of 29 vehicles.

Another "dangerous" load was discovered similar to that reported last year. A trailer containing three lions was found to have no brakes, although pseudo brake connections were shown between the tractor and the trailer.

During the year 20,002 vehicle inspections were carried out. This number is about 4,000 more than the previous year, but it is accounted for by the inspections made prior to renewing licences. The bulk of this work was carried out between April and July, and did in fact almost completely occupy the time of the vehicle examiners for that period. A large proportion of these inspections had to be made outside the usual hours of work and included (by agreement) many Saturday afternoons and, I regret to say, Sundays.

Throughout this Area "C" licensed vehicles are, generally, less well maintained than "A" or "B" licensed vehicles, and agricultural goods vehicles are the least well maintained of all.

Trunk service vehicles as a whole are found to be in good condition, and this may be due to some extent to the best vehicles of a fleet being used for night work.

There is a decided improvement in cattle transporting vehicles.

One thousand two hundred and twenty-one prohibitions were issued during the year; of this number 986 took effect immediately and 235 were delayed.

It is the practice in this Area, when defects are discovered, to permit a vehicle to be repaired on the spot if possible, and so to avoid the issue of a prohibition. This is appreciated by operators and enables the vehicles to carry on without undue inconvenience. During checks on the road it is not uncommon to see several drivers adjusting brakes, tightening loose bolts and carrying out repairs.

The 1,221 prohibitions issued show that 6 per cent. of the vehicles examined were found to be seriously defective in some respect. These prohibitions required 820 first clearance inspections, 264 second clearance inspections, and 108 third clearance inspections. In many cases where the defects were numerous, the vehicles were scrapped. Defects are mostly associated with the steering gear and the brakes. In a large number of cases of defective hand brake, the threadbare excuse that it is only used for parking continues to be offered.

The following table shows the defects for which prohibitions have been issued:—

<i>Defect.</i>	<i>Number of cases.</i>
Front axle beam ... ..	12
Water circulation ... ..	20
Rear axle ... ..	39
Steering stops ... ..	47
Exhaust system ... ..	87
Steering arms and ball pins ... ..	99
Petrol system ... ..	102
Engine and transmission ... ..	116
Road wheels and studs ... ..	137
Frame, frame members and brackets ... ..	202
Front swivel axles, bushes and pins ... ..	207
Steering track rod and drag link ... ..	234
Spring shackles, pins and bushes ... ..	314
Springs and brackets ... ..	322
Foot brake and mechanism ... ..	404
Body work and wings ... ..	448
Hand brake and mechanism ... ..	490
Steering column, box and drop arm ... ..	568
Other defects ... ..	253

*Table showing the number of vehicles inspected and the number of prohibitions issued.*

<i>Year.</i>	1936-7.	1935-6.	1934-5.
Prohibitions issued ... ..	1,221	1,494	1,371
Vehicle inspections ... ..	20,002	16,175	13,196
Per cent. $\frac{\text{Prohibitions}}{\text{vehicles}}$ ... ..	6	9.2	10.4

*Road Checks for Vehicle Maintenance.*

During the past year several road checks were made by day and by night.

Owing to the rapidity with which the news spreads that a check is being carried out, results may be disappointing after four hours. During the check at Stamford on 22nd February, 1937, about 4 a.m. a lorry driver stated that the check was known in London.

Rather more than half of the vehicles inspected during these checks were licensed outside this Traffic Area. Of the 91 vehicles inspected at a check carried out on one occasion during the night, only two were licensed in this Traffic Area.

Many accidents have been investigated and those having special interest or involving important mechanical features have been reported to the Ministry.

The relationship between operators and the technical staff continues to be good and the former make full use of the expert mechanical knowledge of the latter.

It will be seen by reference to the section of this report on Enforcement that proceedings were instituted in 163 cases of defective vehicles.

*Enforcement Section.*

9. During the year under review, the work of the Enforcement Staff has increased considerably as is evidenced by the comparison of the number of prosecutions undertaken during the year (2,331) with the number for the previous year (1,300 cases).

It is unfortunately the case that conditions generally in regard to observance of the law (particularly those statutory provisions relating to hours of driving and keeping of records) show little sign of improvement; and detection of offences is becoming increasingly difficult owing to licence-holders and drivers becoming more clever in the manipulation of records. It is my experience that, generally speaking, a straightforward scrutiny of records to-day reveals few or no offences. The practice of examining records and instituting proceedings in respect of irregularities openly shown thereon has undoubtedly led to faking of records; and it is clear that there is now a preference for taking a chance of being detected with no record or a false record than for keeping true records which themselves openly reveal over-working and other breaches of the law.

It is to be remembered, in this connection, that as I stated in my report of last year, there is no provision made in the Act of 1933 for the punishment of making false entries in the records except that which relates to an offence for failing to keep a current record; and I am now more than ever convinced that Section 16 or Section 34 of the Act should be strengthened so as to cover the making of false entries in a record.

In order to meet the changed conditions brought about by the manipulation of records, I have now directed the efforts of my Enforcement Staff mainly to road checks, and some considerable increase of success in this direction has been achieved. The following details regarding a check undertaken during the year on traffic emanating from the County of Lincolnshire will serve to illustrate the policy now being adopted by me.

Since July, 1936, particular attention has been paid to the goods traffic emanating from the County of Lincolnshire where conditions generally in regard to the observance of the requirements of Section 19 and the Keeping of Records Regulations were believed to be particularly bad. The traffic in question mainly comprises timber and market produce.

In September, 1936, a check of the Grimsby timber traffic was arranged, and as a result 111 summonses were served, convictions being recorded in each case, the fines and costs totalling £71 9s. During the winter of 1936 records were examined of a large number of operators in the locality of Boston, and proceedings were instituted where the circumstances warranted it. The conditions obtaining generally were found to be extremely bad, and the operators were warned verbally on many occasions that their operations would continue to be carefully watched and would be the subject of further checks. It was thought that these warnings, together with the publicity resulting from the prosecutions undertaken during the winter of 1936-37 would have served a useful purpose in checking the rampant disregard for the provisions of the Act and Regulations. Further, in order that drivers themselves should be made aware authentically of the provisions and requirements, I agreed to requests that my Enforcement Officer should address several mass meetings of drivers. These meetings, which were held on Sunday mornings, were, in each case, well attended; in some cases operators themselves took advantage of the occasion to be present.

With the knowledge gained as the result of the preliminary check and examinations of records, it was clear that any further local check of the Lincolnshire Traffic would not give any really useful result; and accordingly it was decided, with the co-operation of the Licensing Authorities of all other Areas in England, to arrange a country-wide check, primarily of the Lincolnshire Traffic. Subsequently, it was arranged to include also Eastern Area traffic to and from the Fen country.

The period fixed for the check was from 6 p.m. Sunday, 25th April, till midnight Tuesday, 27th April, a total of 54 hours continuous day and night checking.

Road control points were fixed at:—

*Metropolitan Traffic Area.*

1. At a point on Road A.1 (Great North Road) near Stanborough Village.

*East Midland Traffic Area.*

1. Newark.
2. Sleaford.
3. Grantham.
4. Louth.
5. Market Deeping.
6. Grimsby.

*Yorkshire Traffic Area.*

Thorne.

*Eastern Traffic Area.*

1. Spalding.
2. Trumpington.

*West Midland Traffic Area.*

1. Lichfield.
2. Tamworth.

Additionally, Market Controls were arranged at and in the neighbourhood of certain Markets.

Further, all Examiners throughout the country, who were not engaged actively in the check, were asked to note particulars of goods vehicles bearing any of the Lincolnshire Registration marks which might be observed by them during the normal course of their duties.

The check duly took place as arranged, and the following statistics may be of interest. Two thousand, nine hundred and fifty-six vehicles were observed and these were from the following areas:—

East Midland Area	...	...	...	...	...	...	1,292
Eastern Area	...	...	...	...	...	...	614
Metropolitan Area	...	...	...	...	...	...	392
Yorkshire Area	...	...	...	...	...	...	328
West Midland Area	...	...	...	...	...	...	152
South-Eastern Area	...	...	...	...	...	...	74
North-Western Area	...	...	...	...	...	...	55
Northern Area	...	...	...	...	...	...	31
Western Area	...	...	...	...	...	...	8
South Wales Area	...	...	...	...	...	...	7
Northern Scotland Area	...	...	...	...	...	...	3

The 1,292 East Midland Area vehicles belonged to 696 licence holders. All the licence holders were asked to produce their drivers' records for two weeks covering the period of the check. The records produced were related to the check observations, and in cases where the records were found to be consistent, they were returned forthwith. In the cases where the records were inconsistent with the check observations, the records were thoroughly examined and the parties concerned were interviewed. Of the 696 licence holders in the East Midland Area who came under review as the result of the check, the records of 387 were found to be inconsistent with the check observations. In a large number of the remaining cases the check revealed only day time observations at such times as made it impossible to ascertain definitely whether or not records were being faked.

In the cases of inconsistent records, proceedings were only authorised in those in which it could be proved that the inconsistencies covered up serious "hours" offences. This notwithstanding, it was still found necessary in this Area alone to issue 337 summonses as the result of the check. In addition, 144 warnings were issued to operators whose records were incorrect but where no proof of "hours" offences was available.

In a number of cases where the records were found to be consistent, the form of record or manner of completion was unsatisfactory, and as a result 41 special visits to operators were made by the Traffic Examiners in order to explain fully the requirements of the Regulations.

A noticeable feature of the check was the poor illumination or dirty condition of many of the rear identification plates of goods vehicles. It would seem impossible to come to any other conclusion than that the identification plates were in a large number of cases being deliberately disfigured or partly obliterated in order to make observation difficult. This feature has been noticeable in many checks undertaken, and is commented upon in the following extract of a letter dated 14th July, 1937, received from a Superintendent of Police, who collaborated with me in another check:—

"During the time observation was kept it was noticed that a good many goods motor vehicles had dirty rear Index Plates and it was difficult, and in some cases, impossible to obtain the index numbers."

Checks on the road have also shown that many holders of "C" licences do not comply with the Keeping of Records Regulations in that they neglect to record their hours of rest and driving at the proper time. In November, 1936, in the hope of avoiding many prosecutions, I communicated with all the Chambers of Commerce in the Area and asked them to draw the attention of their members to the requirements of the Regulations. The response on the part of the Chambers was very encouraging.

#### *Prosecutions.*

During the year the following prosecutions in respect of goods vehicles have been undertaken by me or by the Police with my Officers being concerned as witnesses.

*Lists of Prosecutions authorised by the Licensing Authority, or where a witness attended from the Licensing Authority's office,  
1st October, 1936 to 30th September, 1937.*

Offence.	Section of Act or Regulation.	No. of Summons Heard.	Fines.	Costs.	Costs allowed to L.A.	Dismissed.	Cases pending.		Warnings.
							Date Fixed.	Not Fixed.	
1. Excessive hours ...	S. 19 R.T.A. 1930 Ss. 8 & 9 R. & R.T.A. 1933.	670	£ s. d. 541 14 6	£ s. d. 109 15 2	£ s. d. 89 11 0	16	38	42	329
2. Dangerous vehicles ...	62 & 85 (C. & U.) Regs. 1931 67 & 94 (C. & U.) Regs. 1937.	116	212 9 6	34 13 6	33 17 6	5	5	9	—
3. Inefficient brakes ...	63 & 85 (C. & U.) Regs. 1931	38	58 10 0	1 18 0	1 1 0	—	5	—	—
4. No Carrier's licence ...	S. 1 R. & R.T.A. 1933 ...	65	38 14 0	7 19 5	6 3 0	1	—	1	61
5. Breach of Licence A.B.C. & Con.	Ss. 8 & 9, R. & R.T.A. 1933	30	36 3 0	25 3 6	18 19 6	1	1	9	9
6. Using vehicle while under prohibition.	S. 17, R. & R.T.A. 1933 ...	9	16 15 0	1 4 0	1 1 0	—	—	—	—
7. No. H.G.V. Licence...	S. 31, R.T.A. 1934 ...	29	30 19 6	2 0 6	1 10 0	—	5	—	6
8. Records ...	S. 16 R. & R.T.A. 1933, Ss. 8 & 9 R. & R.T.A. 1933.	971	551 9 9	93 4 11	82 4 11	28	149	43	341
9. No identity disc ...	12 (L. & P.) Regs. 1936 ...	24	8 16 6	1 2 0	—	2	1	1	135
10. Speeding (breach) ...	Ss. 8 & 9 R. & R.T.A. 1933	45	44 10 0	6 15 0	5 5 0	—	4	10	14
11. Miscellaneous ...	Various ...	11	5 2 0	2 3 0	10 0	—	—	—	—
		2,008	1,545 3 9	285 19 0	240 2 11	53	208	115	895

Of the 53 cases dismissed, 12 were in respect of charges of failing to produce records in that the documents produced were not the records handed in by the driver. In these cases, the Bench impounded the papers with a direction that they should be forwarded to the Public Prosecutor. I have not heard the result of this action.

In three cases of altering a record with intent to deceive, the Benches decided to dismiss the summonses on the ground that there was insufficient evidence of the intent to deceive. In the remaining cases, it was not considered that they were of sufficient importance to justify an Appeal.

Although the number of prosecutions undertaken by me during the year under review shows a considerable increase on the number undertaken during the preceding 12 months, the extent to which this is having any effect of permanently improving matters is problematical. The fines inflicted in the Courts are generally small and seem to have little deterrent effect and I am unfortunately compelled to accept the view that there will be little permanent improvement until—as I now propose increasingly to do—I avail myself of the powers of revocation or suspension of licences conferred on me under the provisions of Section 13 of the Act. As an example I may say that in the Boston Area no less than 291 successful prosecutions were instituted by me for contraventions of the statutory conditions of the licences and in addition 45 operators were warned by letter. I have, therefore, decided to hold a special public inquiry at Boston with a view to considering what further action should be taken.

During the year under review, I refused to grant the renewal of an "A" licence owing to continued breaches of Section 19 of the Act of 1930; I suspended one "A" licence for a month and revoked another "A" licence for breaches of the conditions of the licence. In a further case I refused to grant the renewal of five vehicles on a licence owing to their persistently unsatisfactory maintenance.

Many of the hauliers who find themselves in trouble have themselves to blame for regarding the hours laid down in the Act as minimum instead of maximum hours of driving.

A feature of the provisions of Section 19 of the Act of 1930 (as amended by Section 31 of the Act of 1933) which seems worthy of review when occasion offers is that relating to the period of time available to a driver for rest. As the law stands at present the period of 24 hours is calculated from the time a driver commences to "drive". It is within my knowledge that there are employees being required by their employers to work in the fields during the day (which work cannot be brought within the category of driving) and then at night to undertake a spell of driving a goods vehicle. In such cases, it is obvious that there is a considerable risk arising through excessive fatigue on the part of the driver which is not covered by the provisions of the Act and it would not appear unreasonable if the period which is required to be available for rest were calculated from the time a driver commenced work of any description.

#### *Co-operation with Police and Local Taxation Authorities.*

10. Close co-operation with Police Authorities and Local Taxation Authorities has continued during the year and it is gratifying to be able to express my pleasure at the readiness of these Authorities to render me all the assistance within their power. During the course of the year information, which came to light during the course of my staff's investigations into a records case concerning the operation of a goods vehicle without a Road Fund Licence, was passed on to the Taxation Authority concerned and resulted in proceedings being successfully instituted in regard to the offence.

#### *Contract "A" Licences.*

11. Operations under these licences have given me some concern from time to time. Owing to the difficulty which newcomers find in entering the industry, some would-be hauliers who possess little knowledge of running costs obtain contracts at very low rates and obtain Contract "A" licences. After a few months running they begin to discover they cannot make the contract pay and are sorely tempted to obtain back loads and other traffic which they are not permitted to carry. Again hauliers who already hold an "A" licence for several vehicles, having failed in their attempt to get an additional vehicle, obtain a

Contract and a Contract "A" licence. When not required for the purpose of the Contract this vehicle should stand in the garage, but the operator sometimes yields to the temptation to use the Contract "A" vehicle to help him out with loads which should be carried by his other vehicles.

Such offences are not easy to detect, but it is obviously in the interest of the great majority of licence holders that these irregularities be kept in check.

### *Speeding.*

12. I have nothing to add to or subtract from what I said last year on this subject. Speeding by Goods Vehicles is still rampant, speeds of 55 miles per hour being observed on the open road, whilst it is not uncommon to be passed by a goods vehicle when travelling at 30 miles per hour in a built-up area. Sometimes the drivers are alone to blame in attempting to redeem mis-spent time, and sometimes the employers are to blame in not allowing sufficient time for the journeys. It will be observed that I successfully proceeded in 45 cases of speeding, and in addition many letters of warning have been sent.

### *Wages.*

13. A large number of complaints are still received, mainly from drivers against their employers, but sometimes from operators against their competitive operators, that wages paid are not up to the Conciliation Board rate. The number of complaints has been less than in the previous 12 months which, unfortunately, must not be regarded as an indication that proper wages are now being paid in the Area. The main reason is, I think, that following the decision in the "Tuckwell Case" the confidence of drivers in the powers of the existing machinery for securing fair wages was shaken and in consequence they slowly slipped back into despondency and inaction in the matter.

It is to be hoped that the new legislation now under consideration as a result of the Baillie Report will prove a satisfactory solution to this difficult problem.

If past experience is any guide, however, whoever is responsible for enforcement will be busy for the first few years.

### *Licensing of Drivers of Heavy Goods Vehicles.*

14. There has been an appreciable increase during the year under review in the number of licences of this type current, the total at 30th September, 1937, being over 9,300, which represents an increase of more than 16 per cent. of the number current at the end of the previous year.

The number of applications received during the year, namely 4,681, although smaller than the preceding year, was in excess of the number anticipated, and these applications, together with those outstanding at the end of September, 1936, were dealt with in the following manner.

Outstanding at 30th September, 1936	...	...	115	
Applications received	...	...	4,681	
			<hr/>	4,796
Licences granted and issued	...	...	4,008	
Applications withdrawn	...	...	135	
Licences not taken up	...	...	8	
Applications refused:—				
(a) failed to pass test	...	...	26	
(b) other reasons	...	...	271	
			<hr/>	4,448
Awaiting disposal at 30th September, 1937	...	...		348

The number of applications awaiting disposal at 30th September, 1937, includes 289 where a provisional licence had been issued and a test had not been undergone by the applicant. Reference to the issue of provisional licences is made later in this part of my report.

It is worthy of comment that, of the total applications received during the year, 2,288 were new applications as distinct from renewals, that is 48.9 per cent. of the total.



The figure stated for applications refused for other reasons is composed as follows:—

Failed to arrange test	...	...	...	...	...	...	...	265
Under age	...	...	...	...	...	...	...	5
Conduct	...	...	...	...	...	...	...	1
								271

The single case of refusal on account of conduct was one in which the applicant's ordinary driving licence was suspended after the receipt of his application for a heavy goods driving licence and prior to the completion of arrangements for a test of ability to drive.

During the year under review, I received reports of the suspension by Petty Sessions of the ordinary driving licences of nine licensees, and I suspended the heavy goods vehicles drivers' licences held by them for similar periods. In four other cases, I suspended a licence granted by me owing to the unsatisfactory conduct of the holder, and revoked one licence for the same reason. Several instances of physical disability were brought to my notice and, in one case, I revoked a licence following the revocation of the licensee's ordinary driving licence when it was discovered he was subject to epileptic fits. An applicant who admitted disablement of a hand was granted a licence after he had passed the driving test.

Tests conducted by Vehicle Examiners numbered 1,186, in which 1,048 candidates were successful and 138 failed. An analysis of the failures is here given:—

Failed to pass first test and awaiting further test	...	...	...	10
Failed to pass first test but passed subsequent test	...	...	...	74
Failed to pass first and subsequent tests and applications refused				26

The last figure represents 52 actual tests, to which must be added the two cases of failure shown in the re-tests for licences to drive additional classes of heavy goods vehicles referred to below.

Many of the applicants have insufficient experience of handling a heavy goods vehicle and do not seem to realise the "bulk" of the vehicle under their care. This may be due to the fact that many of them are used to driving a light van, a lively vehicle, and try to drive a heavy vehicle in the same manner as they have driven a light one. Applicants continue to show an indifferent knowledge of the Highway Code.

The total number of tests carried out by Vehicle Examiners includes 66 dual tests for non-vocational driving licences as a result of which 57 Certificates of Passing were issued and in the remaining nine cases a statement of failure.

In addition, 111 candidates were successful in tests by Examiners employed by the Companies whose tests I have agreed to accept for the purposes of Section 31 (5) of the Act.

Since my last report, the Road Traffic (Driving Licences) Act, 1936, has come into force, providing, *inter alia*, for the issue of provisional licences to drive heavy goods vehicles and also provisional licences to drive additional classes of these vehicles so that persons may learn to drive such vehicles and undergo the driving test under actual road conditions. The number of provisional licences issued since the 1st January, 1937, when the provisions of the Act became operative, was 1,202. This number is included in the figures given in the first paragraph of this section of my report. The number of provisional backings to drive additional classes of vehicles issued was 39 in respect of which 19 substantive backings were granted subsequently, seven were refused, including two who failed to pass the necessary test, one was withdrawn and 12 were still outstanding.

The increase in the number of applications outstanding which will be observed by reference to the figures given in an earlier paragraph of my report, would seem to indicate that good use is being made by applicants of the provisional licences now issued in order to obtain thorough tuition before presenting themselves for test by the Examiners. This is reflected in the percentage of failures of the applicants tested, which fell from 12.02 per cent. during the year ended 30th September, 1936, to 11.63 per cent. during the year under

review. In this connection, it should also be remembered that in the earlier period the applicants included a large proportion of experienced drivers who were applying for the first time under the transitory provisions of Section 32 (2) of the Road Traffic Act, 1934, while the figures for the past year include many drivers who were only slightly over 21 years old and who had little practical driving experience.

The number of women drivers holding this type of licence in this Area has increased to 12, of whom 10 have obtained the licence primarily for the purpose of driving horse boxes.

The number of convictions reported by Police Authorities in relation to heavy goods vehicle drivers continues to be very high, and the majority of these reports are in respect of breaches of the law covering speed limits.

The practice of reminding licence holders who offend in this manner of the power given to a Licensing Authority to suspend or revoke a licence is continued, and where more than one breach is committed by a driver his observations are sought and his case is given special consideration.

I was interested to learn that during part of the year there was not a single holder of a heavy goods driving licence unemployed in one of the County Boroughs in this Area. Apparently this class of driver is in great demand.

(a) *Trailers.*                      (b) *The Neighbouring Farmer.*

15. I have again to draw attention to certain matters which have been referred to in my previous reports. The use of trailers drawn by private cars to avoid the licensing of a goods vehicle and the keeping of records is on the increase. It is quite a common sight in this Area to see a private car full of market garden produce drawing a trailer also loaded. Sometimes the trailers carry as many as 20 sheep or even two beasts. Again, in spite of certain prosecutions which I have successfully undertaken, the farmer holding a "C" licence who carries for his distant "neighbours" still presents a very serious problem in that he competes unfairly with holders of "A" and "B" licences in his own district.

*Rates.*

16. Rate cutting is still the cancer that all reputable hauliers want removing from the industry. Whilst this rate cutting remains, uneconomic operation will continue and any talk of co-ordination is difficult.

To some extent its growth has been stopped by the control of the number of vehicles allowed on the road under class "A" and "B" licences and it will be further retarded if wages are properly controlled as many hauliers will not be able to pay a fair wage on the returns they obtain at present.

But I think there is little doubt that contract licences are in many instances an insidious means by which a trader can induce an unthinking and inexperienced haulier to work at an impossible rate. This class of licence is always a temptation to motor salesmen to exert all their powers of persuasion to get persons to buy their vehicles and some even go to the extent of obtaining "contracts" for the prospective purchasers.

*Thanks.*

17. I desire to record my thanks to the local and Technical Press for the assistance they have rendered to the industry by giving publicity to the proceedings at my Public Inquiries and in the Police Courts. I also wish to thank the Police Authorities for their co-operation, and the many Local Authorities who have readily placed at my disposal Court Rooms for the holding of Public Inquiries.

I desire to acknowledge the assistance and co-operation I have received from the Secretaries of Trade Associations, and to thank all grades of the Staff for their valuable assistance.

I have the honour to be, Sir,

Your obedient Servant,

J. H. STIRK,  
Licensing Authority.

## EASTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

I have the honour to report my proceedings, for the year ended 30th September, 1937, as Licensing Authority for the Eastern Traffic Area, appointed under Section 4 of the Road and Rail Traffic Act, 1933.

### *Public Inquiries.*

2. Fifty-six Public Inquiries, occupying 56 days, were held at the following centres:—Bedford (1), Cambridge (20), Chelmsford (9), Ipswich (8), Norwich (11), Peterborough (7). As far as possible applicants for Licences or for the variation of Licences have been given the opportunity of attending at the centres most convenient to them.

3. All applications subjected to objection and those which, in my judgment, required investigation in public, were heard at Public Inquiries. The Railway Companies continue to be the principal objectors to applications for Licences or for the variation of Licences.

4. The numbers of objections lodged and pursued compared with the numbers of applications received and published are shown in the following Table.

*Table No. I.—Objections Lodged and Pursued against Applications Published.*

Applications for.	" A " Licences.			" B " Licences.		
	Applications published.	Objections lodged and pursued.		Applications published.	Objections lodged and pursued.	
		Total No. received.	No. of applications objected to.		Total No. received.	No. of applications objected to.
Currency Period Licences ...	No. 1,400	No. 137	No. 113	No. 1,972	No. 257	No. 194
Variations of Licences (published) ...	161	145	89	100	51	44
Short Term Licences ...	215	32	28	117	8	8

### *Statistics.*

5. The following statistical Tables contain, in summarised form, particulars of the applications received for Carriers' Licences or for the variation of Licences. Information is also given as to the numbers of Licences current, the number of Licence-holders, and the numbers of vehicles licensed.

*Table No. II.—Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
" A " Licences :—	No.	No.	No.	No.	No.
Currency Period ...	220	1,419	59	1,515	30
Short Term (Section 3 (3) of Act) ...	48	215	14	208	4
Contract ...	3	141	—	141	—
" B " Licences :—					
Currency Period ...	328	1,986	49	2,116	63
Short Term (Section 3 (3) of Act) ...	15	117	—	111	3
" C " Licences :—					
Currency Period ...	17	6,501	—	6,478	—
Short Term (Section 3 (3) of Act) ...	—	100	—	100	—

6. At the close of the year, on the 30th September, 1937, there were 35 Currency Period "A" Licence applications and 86 Currency Period "B" Licence applications not decided. Of these applications 1 "A" and 40 "B" applications were for the regrant of Licences due after the 30th September, 1937. The 37 "A" Short Term and the 18 "B" Short Term applications not dealt with concerned mainly Licences for the sugar beet season October to December, 1937.

7. The applications for Carriers' Licences shown in the above Table includes 38 "A" applications and 24 "B" applications for Licences, to which the provisions of paragraph (b) of Section 11 (3) of the Act of 1933 applied (i.e., applications for a Licence in connection with a business which the applicant has acquired or intends to acquire). Of these applications 19 "A" and 14 "B" were dealt with without publication in Part I of "Applications and Decisions"; the decisions, however, were published in Part III. It has been the general practice to publish applications for Licences where the applicant sought to acquire an existing haulage business, but the circumstances in the 33 applications not advertised were such that there could be no reasonable grounds for objection or need for investigation in public.

8. During the year 7 Public "A" and 7 Limited "B" Short Term Administrative Carriers' Licences were issued.

9. Applications to take advantage of the provisions of Section 12 of the Act were received from one Holding Company. The application, which was granted, referred to a "C" Licence.

10. No Short Term Licences were issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) of the Act of 1933 and Regulation 15 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936).

*Table No. III.—Applications for Variation of Carriers' Licences.*

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles					
"A" Licences (all types) :—					
Published and dealt with at Inquiry ... ..	87	1,368	20	70	26
Published but determined without Inquiry ... ..			4	49	—
Not published ... ..			—	1,239	—
"B" Licences (all types) :—					
Published and dealt with at Inquiry ... ..	53	739	7	15	11
Published but determined without Inquiry ... ..			2	10	—
Not published ... ..			—	716	—
Variations of Special Conditions attached to "B" Licences...	7	54	7	30	8

11. In addition to the numbers of variations shown in the above Table, each of which if pursued (except those relating to special conditions) involved the authorisation of a vehicle or vehicles, I received 65 applications from holders of "A" Currency Licences, 13 applications from the holders of "A" Contract Licences, and 30 applications from the holders of "B" Licences to remove vehicles from their Licences without immediate replacement.

12. The applications for variation of "A" or "B" Carriers' Licences not published in "Applications and Decisions" are composed of those submitted under Section 10 subsection (2) of the Act of 1933 (substitution for a specified vehicle of a vehicle of the same or of a less weight unladen, etc.), which the Licensing Authority is bound to grant, and those applications for variations which, under Section 11 subsection (3)(c) of the Act were considered to be of a trivial character. It has been the practice to publish all applications, although apparently of a trivial character, which might give cause for objection. It

follows, therefore, that no applications for variations "not published" were refused, since any application which appeared to be open to objection, whether trivial or otherwise, was advertised.

13. The applications "published but determined without Inquiry" were those without objection where the evidence of need furnished to the Licensing Authority by the applicant warranted the application being granted without the operator attending an Inquiry.

TABLE No. IV—*Licences Current, Licence Holders and Vehicles Authorised at 30th September, 1937 and 1936.*

Type of Licence.	At 30th September, 1937.			At 30th September, 1936.		
	Licences current.	Licence holders.	Vehicles authorised.	Licences current.	Licence holders.	Vehicles authorised.
	No.	No.	No.	No.	No.	No.
"A" Public Carriers' Licences :—						
Full Term ... ..	1,384*	1,354	4,622	1,633	1,509	4,957
Contract ... ..	202	163	311	163	136	273
Short Term... ..	9	8	10	36	36	66
"B" Limited Carriers' Licences :—						
Full Term ... ..	1,874	1,851	2,856	1,973	1,951	2,978
Short Term... ..	13	12	20	15	15	18
"C" Private Carriers' Licences :—						
Full Term ... ..	10,462	10,462	18,901	10,286	10,286	17,821
Short Term... ..	36	36	39	14	14	13

\* See paragraph 15 of the Report.

*Public "A" Carriers' Licences.*

14. The review of Public "A" Carriers' Licences at the end of the first currency period took place during the year. It was commonly known that many "A" Licensees had redundant vehicles authorised on their Licences due to the provision in the Act of 1933 which enabled operators to claim in the first licensing period, vehicles having an aggregate weight unladen not less than the aggregate weight unladen of vehicles used at any one time during the year beginning 1st April, 1932. Applicants for the regrant of Licences were requested to forward the Registration Books of vehicles authorised on their expiring Licences, and where vehicles had been removed from Licences by variation the Local Taxation Officer supplied the taxation history of the vehicles. The applicants supplied to me statements of tonnages conveyed and receipts for each month during the licensing period; this information, coupled with the taxation history of the vehicles, enabled me to gauge whether vehicles were, in fact, redundant or whether the operator's business was of a seasonal character. Where it was obvious that redundant vehicles were included in an application the operator was informed that a certain number of the vehicles he had applied for were considered to be redundant and that if he desired to pursue his application for all the vehicles licensed it would be necessary for him to attend a Public Inquiry and produce evidence of need for the vehicles. In all 198 vehicles and 27 trailers were deleted as redundant from applications for the regrant of "A" Licences; most of these vehicles were withdrawn by applicants without further investigation by me when the redundancy was brought to their notice.

15. The statistics given in Table No. IV show that the number of Public "A" Licences current at the 30th September, 1937, was 249 less than at the 30th September, 1936. This decrease is due partly to the fact that whereas in the first currency period a separate Licence was issued to the Railway Companies for each base, in the second currency period an inclusive Licence was issued to each Railway Company to cover all bases in the Eastern Traffic Area. This change was made so that the method of issuing Licences to the Railway Companies should be uniform in all Traffic Areas but involved no change in the policy of requiring the Railway Companies to justify the need for the vehicles located at each separate base. This change accounts for a reduction of 95 in the number of separate Licences current.

16. Apart from new Licences issued where businesses have been transferred, there were seven new holders of "A" Currency Licences during the year. One hundred and sixty-two operators ceased to hold "A" Licences, having surrendered them during their currency or decided not to apply for renewal of their Licences: many of these persons had seasonal businesses only and were granted Short Term Licences which met their needs.

17. Excluding the vehicles licensed to the Railway Companies (645 vehicles) the average number of vehicles authorised to each "A" Licence-holder was 2.9 in 1937, compared with 2.9 in 1936.

18. A feature of the year has been the applications received, especially from the London & North Eastern Railway Company, for the authorisation of vehicles for conveying material to be used in the construction of aerodromes in the East of England. A separate Public "A" Licence authorising 22 vehicles for this purpose was issued to the Railway Company. This Licence was issued for a purpose which in my opinion justified the exercising of my powers under Section 3 subsection (2) of the Act of 1933 and the Licence has a currency period of nine months. I took this course so that undue competition should not arise owing to vehicles being authorised for periods longer than the aerodrome construction work would extend.

19. The number of Public "A" Contract Licences continues to increase. Two hundred and two Licences were current at the end of the year as compared with 163 at the end of the previous year, an increase of 39 Licences or 24 per cent. There is a temptation to use vehicles authorised on this type of Licence regardless of the limited conditions under which they may be operated, thus treating them as though they were specified on ordinary Public "A" Carriers' Licences. This type of offence, which is particularly unfair to licensed hauliers, has been prevalent during the year. In cases where evidence could be obtained of the offences and the intention to misuse has been deliberate or persistent, I have, after the operator has been convicted, revoked his Contract Licence. Seven Public "A" Contract Licences were revoked during the year on these grounds.

#### *Limited "B" Carriers' Licences.*

20. During the year the number of holders of "B" Licences decreased by 100, and there were 122 fewer vehicles authorised. There were 94 new holders of "B" Licences in the year, but 194 persons, many of whom transferred to "C" Licences, did not apply for the regrant of their "B" Licences. The new Licensees included 24 where businesses were transferred under the provisions of Section 11 (3) (b) of the Act of 1933.

21. The number of applications received in the year for the regrant of "B" Licences was 1,833. These applications included 1,689 without modification of the number of vehicles or the special conditions. The applications with modification were 144 or 8 per cent. compared with 13 per cent. in the previous year. Ninety-five (or 5 per cent.) of the modifications sought were to amend the special conditions under which the Licensee can carry goods for hire or reward, i.e., to extend the radius for general haulage, to carry additional commodities, or to provide transport for named persons not previously specified. The decrease in the demand for modifications of the special conditions attached to "B" Licences is an indication that the extent and nature of the business of haulage for hire by "B" operators is now—after three successive annual reviews—becoming stabilised on a generally accepted basis. I anticipate that there will be in future a progressive diminution in the efforts of this type of part-time haulier to expand his powers in order to enter into more intensive competition with "A" operators, whose function it is—and sole source of livelihood—to cater for the general road haulage business of the country.

#### *Private "C" Carriers' Licences.*

22. At the 30th September, 1937, there were 10,462 Private "C" Carriers' Licences current authorising 18,901 vehicles: at the corresponding date in 1936 there were 10,286 Licences current authorising 17,821 vehicles. Thirty-six Short Term Private "C" Licences were current at the 30th September, 1937, authorising 39 vehicles.

23. The original "C" Licences issued in 1934 fell due for regrant at the 1st July, 1937. Four thousand seven hundred and seventy-eight Application Forms were sent out to "C" Licensees, and resulting from these Forms 3,767

Licences were issued dating from the 1st July, 1937. About 700 of these Forms were returned through the Dead Letter Office of the Post Office, or were received back from the persons concerned with a note that they had ceased to operate any goods vehicles, or were not returned at all. In addition, it was discovered upon examination of application forms after receipt that in about 300 cases "C" Licences were not necessary, and the fees were returned; these applications came mainly from farmers whose vehicles were taxed at the reduced agricultural rate. It is apparent that many "C" Licensees do not realise that they are obliged to return their Licences and Vehicle Identity Certificates if they cease to operate their vehicles before the Licence has expired.

#### *Maintenance of Vehicles.*

24. Although the need for an improvement in the mechanical condition of goods vehicles appears to be now more generally appreciated in the Eastern Traffic Area, there remains considerable room for further improvement in the standard of maintenance; this is exemplified by the results of the examination of vehicles when stopped on the highway at the special "checks"—see Paragraph 37.

25. Approximately 11,300 examinations of goods vehicles were made by Vehicle Examiners in the Area. In all 2,291 Prohibition Notices were issued during the year, composed of 914 Immediate Prohibitions and 1,377 Delayed Prohibitions. In the previous year (1935-36) resulting from about 8,390 examinations, 1,367 Prohibition Notices were issued, 556 of which were Immediate and 811 Delayed. The number of vehicle examinations shows a marked increase, due partly to the Examiners now being more acquainted with their districts and thus able to arrange the vehicle inspections with a greater economy of time.

26. An analysis has been made of the defects noted on Prohibition Notices issued during the year. The result of the analysis, compared with a similar analysis made last year, is given in the following Table. In comparing the two years it should be remembered that 924 more Prohibition Notices were issued in 1936-37 than in 1935-36:—

TABLE NO. V.—*Defective Vehicles—Defective Parts.*

Defective Parts.	1936-37.			1935-36.		
	No. of Defects.		Percentage Applicable to Vehicles of 2½ tons unladen weight or under.	No. of Defects.		Percentage Applicable to Vehicles of 2½ tons unladen weight or under.
	No.	Percentage of Total.		No.	Percentage of Total.	
		Per Cent.	Per Cent.		Per Cent.	Per Cent.
Steering ... ..	1,804	22	93	1,140	24	88
Springs ... ..	1,410	17	91	688	15	89
Brakes ... ..	1,646	20	91	1,062	22	90
Front Axle ... ..	391	5	97	258	5	92
Wheels ... ..	375	5	63	179	4	84
Frames ... ..	340	4	91	235	5	82
Rear Axle ... ..	160	2	79	73	1	82
Engine ... ..	399	5	88	225	5	85
Exhaust ... ..	150	2	84	92	2	78
Petrol System ... ..	163	2	81	87	2	80
Bodywork ... ..	843	10	89	415	9	87
Water Circuit ... ..	30	—	90	7	—	100
Other Defects ... ..	531	6	92	266	6	88
Total ... ..	8,242	100	89	4,727	100	88

27. During the year the technical staff investigated 50 accidents in which goods vehicles were involved. Eighty per cent. of these goods vehicles were light vehicles under 2 tons 10 cwts. unladen weight. Nineteen of the vehicles had steering defects, and the brakes of 21 vehicles were defective. All the vehicles with steering or braking defects were light vehicles; taking the country as a whole, it is estimated that light vehicles represent over 85 per cent. of the total goods vehicles in use.

28. The number of goods vehicles in the Area of the heavier types fitted with compression ignition engines is increasing considerably. The use of these

heavy oil engines has not had any noticeable effect on the standard of maintenance of the vehicles.

*Heavy Goods Vehicle Drivers' Licences.*

29. The number of persons residing in the Eastern Traffic Area holding current Licences to drive heavy goods vehicles at the 30th September, 1937, was 7,832, representing an increase of 1,114 over the number of Licences in issue at the end of the previous year.

30. Table No. VI gives the numbers of applications received during the year for substantive Licences and provisional Licences and shows how the applications were disposed of.

TABLE NO. VI.—*Heavy Goods Vehicle Drivers' Licences.*

Applications.	Applications for Licences.	
	New Applications.	Renewals.
Outstanding at 30th September, 1936 ... ..	No. 198	No. 62
Received during the year ... ..	1,915	1,785
	2,113	1,847
<i>Disposal :—</i>		
Granted and Licences issued :—		
Claimed ... ..	490	—
Tested by Traffic Area Staff ... ..	801	—
Tested by other Authorised Persons ... ..	56	—
	1,347	1,784
Refused :—		
Under age ... ..	2	—
Fees not paid ... ..	16	—
Failed Test ... ..	54	—
Not a fit and proper person ... ..	1	—
	73	—
Withdrawn ; transferred to other Areas ; failed to undergo test, etc. ... ..	375	9
Outstanding at 30th September, 1937 ... ..	318	54

31. The Heavy Goods Vehicles (Drivers' Licences) Regulations, 1936, came into force on the 1st January, 1937, since when provisional heavy goods vehicle drivers' licences have been issued to applicants who were unable to satisfy the Licensing Authority that, in the course of the year ending on the first day of April, 1934, they had been during any period or periods of, or amounting in the aggregate to, six months, in the habit of driving a heavy goods vehicle. During the nine months ended the 30th September, 1937, 1,046 provisional heavy goods vehicle drivers' licences were issued. Five hundred and one holders of provisional licences were subsequently granted substantive Licences. Two hundred and forty-six applications from holders of provisional licences for substantive licences were refused for various reasons, mainly because the applicants failed to undergo driving tests during the currency of their provisional licences. The majority of applicants who failed to undergo their tests were unable to obtain suitable vehicles for the purpose.

32. Applications for renewals of Licences increased by 866 compared with 1935-36, the reason being that the first renewals of Licences did not fall due until the 1st April, 1936; consequently renewal applications were received only during six months in the comparative period.

33. The total number of tests for heavy goods vehicle drivers' licences or the variation of licences executed by Vehicle Examiners was 1,172, compared with 1,575 in the previous year. The number of applicants tested was 967; of these 797 passed at their first test, 142 required to be tested twice, 21 three times and seven four times. The tests carried out by other authorised examiners are not included in these figures.



34. During the year seven heavy goods vehicle drivers' licences were suspended by me consequent upon information being received that the ordinary driving licences of the men concerned had been suspended by magistrates. In one case the licensee was ordered by a Court of Summary Jurisdiction to undergo a driving test before his ordinary driving licence was restored to him. In addition, one licence was revoked by me on the ground of the licensee's physical disability.

35. No appeals were made to Courts of Summary Jurisdiction against decisions refusing the grant of heavy goods vehicle vocational driving licences.

#### *Wages and Conditions of Employment.*

36. An organisation representative of persons engaged in the road transport industry complained that five operators holding Public "A" Carriers' Licences issued in the Area were not affording to their workpeople the wages and working conditions which the organisation considered appropriate. These complaints were referred to the Chief Conciliation Officer, Ministry of Labour. Subsequently I was informed by the Chief Conciliation Officer that following a joint conference arranged by him in one case a satisfactory understanding had been reached between the complainants and the operator concerned. The remaining four complaints were, at the request of the organisation, placed in abeyance pending consideration of the Report of the Committee on the Regulation of Wages and Conditions of Service in the Road Motor Transport Industry (Goods).

#### *Enforcement.*

37. During the year the policy of holding "checks" at pre-selected points on the highway in co-operation with the Police Authorities was continued and intensified. The "checks" fall into two classes (a) where the vehicles were stopped and examined as to their mechanical condition and drivers' records, vehicle identification certificates, etc., were inspected, and (b) where observations were made of the movements of vehicles, such observations subsequently formed the basis for checking the drivers' records. Particular care has been taken to reduce to a minimum the delay to vehicles examined. When a vehicle which has been stopped is mechanically sound and the driver's record is in order the average time a vehicle is delayed is about four minutes. These "checks" resulted in many prosecutions being instituted or warning letters issued for a variety of offences against the Acts and Regulations.

38. In all 22 "checks" were made, 18 when the vehicles were stopped and four when observations only were kept; one observation check was conducted in conjunction with other Traffic Areas. The mechanical parts of 611 vehicles stopped were subjected to examination; of these vehicles 245 (or 40 per cent.) were found to be defective, necessitating prohibitions being issued; 90 (or 15 per cent.) were in such a dangerous condition as to be immediately prohibited from carrying goods. Police Court proceedings were instituted against 27 owners and 26 drivers of dangerous vehicles. Last year, when 196 vehicles were inspected, 77 (or 39 per cent.) were found to be defective. These high percentages of defective vehicles are unsatisfactory. They give some indication of the proportion of operators who do not pay proper attention to the mechanical condition of their vehicles, for usually the vehicles owned by an operator are either all well maintained and roadworthy or there is a general carelessness or disregard of defects throughout his fleet of vehicles.

39. The observation "checks," which have proved to be very effective, have disclosed that drivers' records are often deliberately falsified. Suitable disciplinary action has been taken either by prosecution or warning where false entries have been discovered. There continues to be a lack of supervision on the part of many operators of the hours worked and journeys made by their drivers. As the number of drivers' records inspected increases, the tendency to make the maximum statutory day's work of eleven hours driving the normal daily working hours of a driver is more noticeable. Speeding is prevalent according to the particulars shown on many drivers' records: as more staff becomes available for observation duties this dangerous practice will be given closer attention.

40. In certain trades where there is a stress of business at week-ends the rest periods of employees engaged in driving goods vehicles or partly in driving and partly in other duties are often less than the statutory ten hours. Cases have come to notice where the rest period at the week-ends has been as low as five or six hours in the twenty-four hours.

41. Approximately 1,500 prosecutions were instituted by me, or in cases reported to me, by the Police Authorities, for offences against the Acts and Regulations. In addition about 500 warning letters were issued. The number of prosecutions is shown in the following table:—

TABLE No. VII.—*Prosecutions.*

Offence.	Convictions.	Dismissals.	Alternative Summons Withdrawn.	Total.
	No.	No.	No.	No.
<i>(a) Licensing Offences.</i>				
Road and Rail Traffic Act, 1933; Goods Vehicles (Licences and Prohibitions) Regulations, 1936:—				
Use of authorised vehicle ... ..	102	1	1	104
Irregular use of vehicles authorised under:—				
“A” Licence ... ..	6	—	—	6
“A” (Contract) Licence ... ..	31	—	—	31
“B” Licence ... ..	45	1	—	46
“C” Licence ... ..	6	—	—	6
Use of goods vehicle whilst under prohibition	60	4	—	64
Failing to display Identity Certificate ...	35	2	1	38
Use of Identity Certificate with intent to deceive ... ..	2	2	—	4
<i>(b) Offences relating to Hours and Records.</i>				
Road Traffic Act, 1930 (Section 19); Road and Rail Traffic Act, 1933 (Sections 16 and 31); Goods Vehicles (Keeping of Records) Regulations, 1935:—				
Driving for more than 5½ hours without rest...	162	14	2	178
Aggregate driving periods in excess of 11 hours	81	1	1	83
Less than 10 consecutive hours for rest ...	124	1	2	127
Failure to cause current records to be kept ...	197	11	4	212
Failure to keep (or carry) current records ...	267	8	5	280
Perjury Act, 1911; Forgery Act, 1913:—				
False entry in driver's records ... ..	10*	—	10	20
<i>(c) Heavy Goods Vehicle Vocational Driving Licence Offences.</i>				
Road Traffic Act 1930 (Sect. 9 (3)). Road Traffic Act, 1934 (Section 31). Road Traffic (Driving Licences) Act, 1936:—				
Employing unlicensed heavy goods vehicle driver	25	—	—	25
Driving without heavy goods vehicle driver's licence ... ..	37	—	—	37
Aiding and abetting driver to drive without licence	3	—	—	3
Holders of Provisional Licences driving unaccompanied ... ..	4	—	—	4
Aiding and abetting drivers so to drive ...	2	—	—	2
Driving heavy goods vehicle whilst subject to disqualification by reason of age ... ..	6	—	—	6
<i>(d) Offences under the Motor Vehicles (Construction and Use) Regulations, 1937.</i>				
Inefficient brakes ... ..	104	4	2	110
Defective tyres ... ..	15	—	—	15
Use of vehicles in dangerous condition ... ..	95	23	4	122
	1,419	72	32	1,523

\* Defendant in these cases was committed to Assizes and there bound over for two years.

42. To ensure that the conditions attached to Carriers' Licences are observed, particularly those relating to the employment of drivers of goods vehicles, and in the interests of public safety, there is an urgent need to intensify the enforcement of the provisions of the Acts and Regulations. But this will entail additions to the staff in the Area for enforcement duties.

43. Eight Public Inquiries were held in accordance with the provisions of Section 13 of the Act of 1933, to consider whether Carriers' Licences should be suspended or revoked because of frequent breaches of the conditions of the

Licences. As already stated in this Report, seven Public "A" Carriers' Contract Licences were revoked. One Public "A" Carrier's Licence was suspended for fourteen days and 1 Limited "B" Carrier's Licence was suspended from the 1st August to the 31st October, 1937. In addition I refused an application for the regrant of a Public "A" Carrier's Licence for four vehicles and one trailer because of the misconduct of the applicant in the capacity of a carrier of goods.\*

#### *Appeals.*

44. One appeal was lodged during the year with the Road and Rail Traffic Appeal Tribunal under Section 15 of the Road and Rail Traffic Act, 1933. The appeal was against a decision on an application for the regrant of a Public "A" Carrier's Licence when I refused to regrant the same number of vehicles as previously authorised as, in my opinion, the number of vehicles applied for could not be justified. The appeal was abandoned on a date prior to that arranged for the hearing by the Tribunal.

#### *General.*

45. There has been, during the year, a very considerable increase in the numbers of trailers towed behind private motor cars; the use of these trailers for conveying produce or animals to local markets has been particularly noticeable. The combined unit is often observed to be difficult to manoeuvre on the highway and unsteady in running. The Vehicle Examiners have not been able to undertake a systematic inspection of these vehicles, but considerable doubt exists as to the efficiency of the methods used for connecting the car and trailer, and the earliest opportunity will be taken to bring these vehicles under closer observation.

46. I continue to receive applications for Carriers' Licences or for additional vehicles to be authorised on Carriers' Licences consequent upon tenders having been made to and accepted by Local Authorities for the supply of haulage contingent upon the requirements of the Authorities concerned. This method of competitive tendering for haulage work is liable to lead to rate-cutting; rates are, in fact, frequently quoted for this type of haulage, which would be unremunerative if reasonable wages were paid and vehicles maintained in an efficient condition. The acceptance of a tender of this description (often loosely termed a "contract") by the Local Authority involves no obligation on their part to employ all, or indeed any, of the vehicles specified on the tender. Almost invariably it is the practice of the Local Authority to safeguard their position in connection with their public works programmes by accepting tenders to an extent which secures an ample margin of haulage power beyond their maximum requirements. Moreover, the tenders usually cover a period of only one year, whereas an "A" Licence, if granted, authorises a vehicle to be used for two years. Wasteful competition is therefore created during the second year of the Licence if the tender of another haulier is accepted for the second year, and the vehicles ear-marked for the first year become redundant. Tenderers are often disappointed when they find that I am not prepared to authorise additional vehicles solely on the grounds that a tender of this description has been accepted by the Local Authority. A reliable estimate by the Local Authority of the number of vehicles which should be licensed for road works for the coming year is, I am aware, not free from difficulty, but any estimate made in advance could be reviewed at a later date should the Local Authority find it necessary to do so owing to any unexpected enlargement of their works programme. If the Local Authorities could arrange to be represented at Public Inquiries so as to furnish evidence as to their requirements when applications are heard in regard to licensing vehicles for public road works, it would be valuable assistance to me in administering the Act so as to minimise wasteful competition.

47. Another problem which has come to the fore recently is in connection with the licensing of the vehicles of hauliers mainly or solely employed by clearing houses. The normal "A" Licensee, operating as an established haulier on his own account, can usually keep his vehicles employed without sudden or radical fluctuations, whilst meeting the haulage requirements of his customers and the

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\* This decision is the subject of an appeal to the Road and Rail Traffic Appeal Tribunal.

district in which he is located. The demands of this operator's customers may increase or the business of his district may expand, justifying an application for additional haulage power, but the solid core of his regular business as a haulier remains fairly constant throughout the period of his Licence. On the other hand, a haulier with no other customers than a clearing house is liable to invade a new base or disappear at any time from that base, as his operations are entirely dependent on the goodwill of one employer. A dispute over rates, or for some other cause, with the clearing house, and this operator is out of business and another haulier, possibly licensed at another base, is set up in his stead, thus upsetting the balance of supply and demand in the local haulage market. If, as must normally be the case, the transfer of business occurs during the currency of a Licence, the haulier deprived of clearing house patronage seeks new business with which to employ his idle lorries and wasteful competition and rate-cutting inevitably result. The introduction and general adoption of a satisfactory system of haulage rates will, I hope, help to check this wasteful operation which is unfair to the established local haulier.

48. The seasonal haulage of sugar beet and later the haulage of by-products from the factory after the manufacture of sugar, is a prominent feature of the traffic passing by road in the Area during the months from October to January in each year. I should welcome co-operation from the sugar beet industry in licensing vehicles for this traffic so that I could be satisfied that adequate vehicles are available and that surplus vehicles are not authorised. Many of the local managers of sugar beet factories have been helpful in this respect, but the information obtainable to regulate the supply of vehicles to meet the actual requirements of this seasonal traffic is still incomplete. If the sugar beet factories had a system whereby they could notify me of approved hauliers permitted to enter the various factories, and if possible the planted acreage or the estimated tonnage of sugar beet each haulier was expected to carry, I should be better placed to judge whether road transport facilities were adequate. I much appreciate the co-operation of the factory managements in permitting the mechanical examination of vehicles on factory premises; the result of these examinations has been that the general standard of mechanical condition of vehicles employed in the haulage of sugar beet has improved.

49. It is now possible to ascertain with a degree of accuracy the centres where traffic mainly arises in the Area, for these should usually be coincident with the bases at which operators are licensed. The widely scattered distribution of "A" and "B" vehicles as exemplified by an analysis of the bases of licensees in an agricultural Area such as the Eastern Traffic Area is particularly noticeable. The following Table, which relates to hauliers with bases in Norfolk, is typical of this wide diffusion of vehicles in country districts:—

*Table No. VIII.—Bases of Hauliers in Norfolk.*

—	Total No. of Bases.	Bases with :—		
		" A " Operators only.	" B " Operators only.	" A " Operators and " B " Operators.
		No. of Bases.	No. of Bases.	No. of Bases.
County of Norfolk (excluding County Boroughs Norwich and Great Yarmouth).				
Bases with 1 Operator(s) ...	172	55	110	7
" " 2 " ...	72	13	31	28
" " 3 " ...	26	2	11	13
" " 4 " ...	19	—	1	18
" " 5 " and over	35	—	3	32
Total ... ..	324	70	156	98

50. In Norwich there are 114 operators, i.e., 32 "A" Licensees, 76 "B" Licensees, and six operators holding "A" and "B" Licences. In Great Yarmouth 64 operators are licensed, i.e., 26 "A" Licencees, 33 "B" Licencees, and five "A" and "B" Licencees.

51. This Table illustrates in so far as one county is concerned that in many towns and villages there is one local haulier who generally owns one vehicle only. These local men are known in their locality to be able to provide for the normal haulage requirements, and although their haulage business may often be seasonal, they meet the local need. At about one-third of the bases there is only a "B" Licensee, who makes a living by performing haulage to varied destinations, often at irregular intervals, as an auxiliary to some other trade or business carried on by him. In my opinion this is one of the reasons why absorptions and amalgamations in the haulage trade are not so many as those which occur between Passenger Service operators, where the services are scheduled and of a less intermittent character.

52. I desire to record my thanks to the Police Authorities for the assistance they have given in enforcing the Act and Regulations during the year.

I have the honour to be, Sir,

Your obedient Servant,

HAVILAND HILEY,

Licensing Authority.

## SOUTH WALES TRAFFIC AREA

To the Minister of Transport.

SIR,

I have the honour to submit to you in accordance with Sub-section 4 of Section 23 of the Road and Rail Traffic Act, 1933, my Third Report in regard to the duties under Part I of the Act imposed upon me by Section 4 of the Act.

### *Period covered by the Report.*

1. This Report covers the period from the 1st October, 1936, to the 30th September, 1937.

### *Applications for Carriers' Licences.*

2. The following table shows the numbers of applications for licences received during the period under review and the manner in which those applications were dealt with:—

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>"A" Licences :—</b>					
Currency Period ...	56	529	14	536	17
Short Term, Section 3 (3)	—	14	—	14	—
Contract... ..	1	81	3	78	—
<b>"B" Licences :—</b>					
Currency Period ...	180	1,982	38	1,980	45
Short Term, Section 3 (3)	—	30	—	30	—
<b>"C" Licences :—</b>					
Currency Period ...	15	4,649	25	4,476	—
Short Term, Section 3 (3)	—	69	—	69	—
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ...			1	—	1
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..			—	—	—
Short Term Administrative Licences issued (Section 3 (4)) ...			2	1	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Regulation 15 of the Licences and Prohibitions Regulations) ... ..			37	10	—

### *Applications for Variations of Carriers' Licences.*

3. The following table shows the numbers and the classes of applications for variations of licences received during the period under review, and the manner in which those applications were dealt with:—

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>Variations relating to vehicles</b>					
<b>"A" Licences :—</b>					
Published and dealt with at Inquiry ... ..	22	581	4	46	30
Published but determined without Inquiry ... ..			9	31	—
Not Published ... ..			10	453	—
<b>"B" Licences :—</b>					
Published and dealt with at Inquiry ... ..	26	818	8	66	26
Published but determined without Inquiry ... ..			11	48	—
Not Published ... ..			5	664	—
<b>Variations of Conditions attached to "B" Licences ...</b>	12	58	8	39	19

*Applications under Section 2 (4) of the Road and Rail Traffic Act, 1933, for permission to use vehicles authorised under "C" licences for the carriage of goods for persons to whom the vehicles are let.*

4. Apart from a small number in connection with the use of vehicles by the Postmaster General for local deliveries of mails during the Christmas period no applications falling within the above category were received during the period under review.

*Revocation and Suspension of Licences.*

5. During the year under review I held three Public Inquiries for the purpose of investigating whether breaches of conditions attached to two Public "A" Carriers' Licences and to two Public "A" Carriers' (Contract) Licences had been committed and if so what disciplinary action, if any, I should take. The allegations were that drivers had worked for periods in excess of those lawful under Section 19 of the Road Traffic Act, 1930, that the provisions of Section 16 of the Road and Rail Traffic Act, 1933, relating to the keeping of records had not been complied with, and that conditions attached to "A" Contract Licences had not been complied with. The Inquiries were held at Newport on the 6th May and on the 22nd June and at Swansea on the 25th June, 1937. On the 6th May, I found that breaches of Section 19 of the Road Traffic Act, 1930, and of Section 16 of the Road and Rail Traffic Act, 1933, had been committed by the holders of the Public "A" Carriers' Licences, and I decided to suspend those licences for periods of one week and two weeks respectively. On the 22nd June I found that breaches of the conditions attached to an "A" Contract Licence had been committed and I suspended the licence for a period of fourteen days. At the Inquiry on the 25th June, after fully investigating the allegations that a carrier had failed to comply with the conditions attached to an "A" Contract Licence held by him I decided to revoke the licence.

In addition to the above, on the 5th May, 1937, I found it necessary to suspend for a period of fourteen days an "A" Contract Licence the holders of which elected not to have the matter investigated at a Public Inquiry.

*Applications for new licences in substitution for existing "B" licences.*

6. During the year applications for new licences in substitution for practically all existing "B" licences were dealt with. As most of these licences had already been reviewed during the year ended 30th September, 1936, there was very little conflict in the cases in which new "B" licences were applied for without variation of the conditions attached to the expiring licences and these cases formed the greater proportion of the applications.

*Applications for new licences in substitution for existing "A" licences.*

7. The year under review was the first period during which it became necessary to consider applications for new "A" licences in substitution for existing "A" licences which had been granted for currency periods of two years and which expired on different dates between the 1st October, 1936, and 30th September, 1937. As mentioned in my last Report notices of objection were received in respect of a number of these, the applications against which objections were lodged being generally those of carriers engaged on long-distance haulage and more particularly those who had changed the nature of their businesses during the currency of their expiring licences. It became evident at an early date that the Railway Companies proposed to obtain the ruling of the Appeal Tribunal upon the questions which arose for decision upon these applications for new licences in substitution for existing licences and particularly upon the nature of the evidence required to support the grant of new licences and as most of the applicants involved in my Area were comparatively small carriers I suggested after hearing two or three applications that the more convenient course for all parties would be that I should defer my decisions in the cases which I had heard and adjourn all other applications in which similar questions were raised until the Appeal Tribunal had had an opportunity of laying down the principles

which should be applied. I felt that it might prove a very serious burden upon small carriers to have to bear the anxiety and expense of appeals and further that a great deal of unnecessary expense would be incurred unless some such course were adopted. The Railway Companies accepted my suggestion and I am satisfied that the course which I adopted of adjourning the applications pending the decision of the Appeal Tribunal in the Bouts Tillotson Appeal was one which saved a great deal of expense to all parties. After the decision of the Appeal Tribunal in that appeal the notices of objection were withdrawn in all the cases covered by that decision and new licences were granted without the carriers being put to any expense.

*Change of the circumstances relating to a Carrier's haulage business.*

8. In connection with applications for new "A" licences in substitution for existing licences heard by me during the year under review very interesting and difficult questions have arisen in many cases by reason of the fact that the carriers had in most cases since the beginning of 1934 completely changed the nature of their businesses. There can be no doubt that from the end of 1933 a number of carriers who had hitherto confined their operations to the South Wales Area abandoned their local work and undertook long-distance haulage work from South Wales to London, the Midlands, Manchester, Liverpool, and elsewhere. That work is entirely different from the work previously done by those carriers and in view of the change I have required those applicants to prove a need for the new services. In some cases they have done so and I have granted new "A" licences to enable them to continue the new services as carried on at the time of the hearing of the applications, but where in such circumstances applicants have failed to prove a need I have refused the applications.

*Public Inquiries for the purpose of hearing applications for "A" and "B" licences and variations of such licences.*

9. Public Inquiries were held on a total of 73 days at the followings places, namely:—

	<i>No. of days.</i>
Cardiff ... ..	19
Newport ... ..	15
Swansea ... ..	14
Pontypridd ... ..	9
Carmarthen ... ..	6
Bridgend ... ..	5
Llandrindod Wells ... ..	2
Aberystwyth ... ..	1
Haverfordwest ... ..	1
Lampeter ... ..	1
	—
	73
	—

*Enforcement.*

10. The appointment of the additional Traffic Examiners to which I referred in my last report, together with an increase in the indoor enforcement staff, has made it possible to exercise much closer supervision upon the operations of carriers and particularly as to the hours of work and for rest of drivers.

*Appeals under Section 15 of the Act.*

11. Two appeals were lodged with the Appeal Tribunal against my decisions during the year. One of them was withdrawn. The other appeal is to be heard by the Tribunal on the 10th November, 1937.



*Offences and Proceedings.*

12. I regret to record that the number of cases in which prosecutions were undertaken during the year was substantially in excess of the number during the preceding year. The figures set out below show that the numbers of cases in which proceedings were instituted in respect of offences against the Goods Vehicles (Keeping of Records) Regulations, 1935, and in connection with the employment of persons to drive goods vehicles for hours in excess of those lawful under Section 19 of the Road Traffic Act, 1930 aggregated more than twice the corresponding numbers during the preceding year. It is always distasteful to be compelled to undertake proceedings in large numbers of cases, but it has unfortunately proved to be necessary to do so. I should much prefer that goods vehicles should be operated without breaches of the law occurring. Whilst in a very large number of cases the users of goods vehicles are sparing no effort to comply with the provisions of the Acts and Regulations there is unfortunately also a number who are prepared to resort to all possible subterfuges to circumvent those provisions.

I instituted proceedings in 205 cases against 389 persons in respect of 3,803 offences and I co-operated with the Police Authorities in prosecutions in a further 95 cases against 127 persons in respect of 159 offences in which police officers laid the informations after the cases had been submitted for my consideration. Convictions were secured in respect of 3,844 summonses issued and fines and costs were imposed totalling £1,288 2s. 6d. The offences comprised the following:—

Offence.	Proceedings initiated by	
	Licensing Authority.	Police.
(a) Using vehicles other than under licences in contravention of Section 1 of the Road and Rail Traffic Act, 1933 ... ..	72	45
(b) Failing to keep, to carry, and/or to cause to be kept records under the Goods Vehicles (Keeping of Records) Regulations, 1935 ... ..	825	54
(c) Driving and/or employing persons to drive for hours in excess of those lawful under Section 19 of the Road Traffic Act, 1930 ... ..	2,792	40
(d) Using vehicles whilst notices prohibiting their use were in force, in contravention of Section 17 of the Road and Rail Traffic Act, 1933	5	—
(e) Failing to affix identity certificates to vehicles authorised under "A," "B" or "C" licences in contravention of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936 ... ..	9	14
(f) Breaches of conditions attached to licences, in contravention of Section 9 of the Road and Rail Traffic Act, 1933 ... ..	23	—
(g) Failing to preserve records in contravention of Section 16 (4) of the Road and Rail Traffic Act, 1933 ... ..	6	—
(h) Driving heavy goods vehicles when not licensed for the purpose and/or employing persons to drive such vehicles in contravention of Section 31 of the Road Traffic Act, 1934 ... ..	18	5
(i) Using vehicles in a dangerous condition in contravention of the Motor Vehicles (Construction and Use) Regulations ... ..	48	—
(j) Displaying on a goods vehicle with intent to deceive a cardboard disc so closely resembling a mark by which an authorised vehicle is to be identified, in contravention of Section 34 (1) of the Road and Rail Traffic Act, 1933 ... ..	2	—
(k) Failing to notify licensing authority of vehicles passing out of possession of holder of licence, in contravention of Regulation 21 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936 ...	2	1
(l) Failing to notify licensing authority of change of address during currency of licence, in contravention of Regulation 17 of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936 ... ..	1	—
	3,803	159

In addition to the above the police authorities instituted proceedings summarised below and notified the results to me in 692 cases against 768 persons in respect of 951 offences, fines and costs totalling £1,148 17s. 2d. having been imposed.

	<i>No. of convictions.</i>
(a) Using vehicles other than under licences in contravention of Section 1 of the Road and Rail Traffic Act, 1933	15
(b) Failing to keep, to carry and/or to cause to be kept records under the Goods Vehicles (Keeping of Records) Regulations, 1935 ... ..	172
(c) Driving and/or employing persons to drive for hours in excess of those lawful under Section 19 of the Road Traffic Act, 1930 ... ..	12
(d) Failing to affix identity certificates to vehicles authorised under "A," "B" or "C" licences, in contravention of the Goods Vehicles (Licences and Prohibitions) Regulations, 1936 ... ..	35
(e) Using vehicles in a dangerous condition in contravention of the Motor Vehicles (Construction and Use) Regulations ... ..	158
(f) Dangerous driving, etc. ... ..	72
(g) Driving in excess of speed limits ... ..	210
(h) Policies of Insurance or Driving Licences not in force	72
(i) Miscellaneous offences ... ..	205
	<hr/> 951 <hr/>

#### *Making of false records.*

13. I have for some time made a close personal study of large numbers of records kept by drivers of goods vehicles and I regret that I am driven to the conclusion that a large number of them are deliberately false. In many cases the driver is also the owner of the vehicle and in many other cases it must be obvious to the owner that his driver is making records which are false, and it is difficult to resist the conclusion that the records are falsified with the connivance of the owner. Failure to make proper records through ignorance, carelessness, or laxity is one thing, the deliberate making of false records is quite a different thing. In my opinion fines do not act as a proper deterrent to persons who are prepared to go to the length of making false records and the only remedy is to suspend or revoke the carrier's licence concerned. Prosecutions often involve considerable expense which is not wholly recoverable from the person convicted and it does not seem to me right that the taxpayer should have to pay for the misdeeds of people who break the law for their own benefit. I am now therefore adopting a practice of holding an inquiry whenever possible where allegations of false records are made by the Traffic Examiners, and the penalty, if the allegations are proved, must be a suspension of the carrier's licence with ultimate revocation if a period of suspension does not have the necessary effect.

#### *Maintenance of Vehicles.*

14. 6,776 inspections of 4,711 vehicles were carried out during the year and the use of 1,434 vehicles was prohibited by reason of the defects which were found upon examination of those vehicles. One hundred and seven of the notices of prohibition came into effect immediately on their being issued and the remaining 1,327 notices of prohibition were to take effect at the end of certain specified periods after the dates of issue if the defects had not been remedied in the meantime. Speaking generally the improvement in the standard of goods vehicles is being maintained and the number of new vehicles which are being put on the road is increasing.

#### *Section 93 of the Road Traffic Act, 1930, as amended and applied by Section 32 of the Road and Rail Traffic Act, 1933.*

15. No representations to the effect that employers were failing to comply with the provisions of the Acts relative to the wages and hours and conditions of employment of persons employed by them were received during the year. It is evident that the interested parties are now awaiting the proposed legislation following the Baillie Report.

*Objections against applications for new licences by newcomers into the industry, and for variations of licences by the authorisation of additional vehicles.*

16. The practice adopted by the Railway Companies of giving notice of objection against practically every application for a new "A" licence by a person who is not already the holder of an "A" licence and in respect of the majority of applications for the authorisation of additional vehicles under an existing "A" licence has been continued during the year. This has made it necessary that all these applications should be heard at Public Inquiries and I find that the evidence given at Public Inquiries is generally most useful in giving me a true picture of the use which is being made of road transport by different carriers in different parts of the Area.

*Heavy Goods Vehicles Drivers' Licences.*

17. 1,593 applications for licences to drive heavy goods vehicles were received during the year making with 22 applications in hand on the 1st October, 1936, a total of 1,615 applications for consideration. Seventy-two applications were withdrawn, 5 were refused, 1,273 substantive licences were granted and 22 applications awaited decisions on the 30th September, 1937.

483 provisional licences were issued under Section 2 of the Road Traffic (Driving Licences) Act, 1936. In 137 cases the holders of those licences failed to make arrangements to undergo driving tests during the currency of the licences with a view to their qualifying for the grant of substantive licences and did not apply for new provisional licences on the expiry of those previously held by them. On the 30th September, 1937, 106 provisional licences were current. One licence was revoked under the provisions of Section 31 (7) of the Road Traffic Act, 1934, consequent on the holder having been convicted of the offence of driving a motor lorry in a manner dangerous to the public and his licence under Part I of the Road Traffic Act, 1930, to drive a vehicle having in that connection been suspended for two years. No appeals were made to Courts of Summary Jurisdiction against my decisions on these applications.

Vehicle Examiners carried out 368 driving tests of applicants for licences to drive heavy goods vehicles who already held motor driving licences under Part I of the Road Traffic Act, 1930. 266 applicants passed at first test, 6 applicants failed at first test, 1 failed at second test and 95 passed at second test.

Vehicle Examiners carried out 18 driving tests of applicants for licences to drive heavy goods vehicles who were also applicants for motor driving licences under Part I of the Road Traffic Act, 1930, and in each case the applicant passed at first test.

During the year persons other than vehicle examiners authorised to conduct tests reported that 64 persons had passed tests conducted by them.

On the 30th September, 1937, 52 applicants awaited further tests as drivers of heavy goods vehicles after having in the first instance been tested as drivers of other types of vehicles.

18. I desire to place upon record my thanks to the police for their assistance and co-operation and to all local authorities who have so readily provided the necessary accommodation for Public Inquiries.

I have the honour to be, Sir,

Your obedient Servant,

A. T. JAMES,

Licensing Authority.

## WESTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to submit my report as Licensing Authority for the Western Traffic Area in pursuance of the provisions of sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933, for the twelve months ended 30th September, 1937.

### Applications for Licences.

2. The following table shows the number of applications for carriers' licences received during the period under review and the manner of their disposal:—

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
<b>"A" Licences :—</b>					
Currency Period ... ..	270	1,014	23	1,217	22
Short Term, Section 3 (3) ... ..	1	7	—	7	—
Contract ... ..	4	161	3	161	1 <sup>†</sup>
<b>"B" Licences :—</b>					
Currency Period ... ..	610	3,225	40	3,327	56
Short Term, Section 3 (3) ... ..	—	32	1	28	2
<b>"C" Licences :—</b>					
Currency Period ... ..	17	9,571	13	9,503	—
Short Term ... ..	—	43	—	43	—

<sup>†</sup> The documents submitted in support of this application did not constitute a contract within the meaning of Section 7 (1) of the Act.

	"A"	"B"	"C"
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ...	—	—	4
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	21	25	—
Short Term Administrative Licences issued under Section 3 (4)...	280	228	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... ..	*62	23	—

\* includes 2 "A" (Contract) Licences.

3. Three applications for "A" licences and 24 for "B" licences were refused owing to lack of prosecution.

4. The new applications received, as distinct from renewals, numbered:— "A" licences, 59; "B" licences, 326; and "C" licences, 2,987.

5. The first batch of "C" licences became due for renewal during the year, which accounts for the large increase in the number of applications for such licences, as compared with last year.

6. A very large number of "C" licence holders failed to apply for renewal of their licences within the time prescribed, and even on the 30th June, 1937 (the date of expiry) in spite of warning notices applications for renewal had not been received in respect of approximately 800 licences. In a number of cases licence holders had either changed their addresses without sending notification, or disposed of their vehicles and failed to return the licences or identity certificates. Where evidence of illegal use was obtained, prosecutions were instituted.

*Variations of Carriers' Licences.*

7. The following table shows the number and the classes of applications for variations of licences received during the year, and the manner in which they were dealt with:—

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles					
"A" Licences :—					
Published and dealt with at Inquiry ... ..	} 30	} 1,335	—	77	19
Published but determined without Inquiry ... ..			25	66	—
Not published ... ..			4	1,141	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	} 41	} 1,341	2	106	11
Published but determined without Inquiry ... ..			33	135	—
Not published ... ..			6	1,075	—
Variation of Conditions attached to "B" Licences...	—	64	3	51	3

8. The applications for variations exceeded by 377 the number for the previous year.

9. In addition to the figures shown in the Table, 6,523 applications were received for variation of "C" licences, and 27 applications under Section 2 (4) of the Act were granted to use vehicles authorised under "C" licences for the carriage of goods of persons to whom they were hired. In 24 of these cases the vehicles were required for the carriage of post office mails at Christmas, and in the remainder, for the carriage of special types of goods for which other licensed vehicles in the district were not suitable.

*Licences and Licence Holders.*

10. The number of licences of each class, number of vehicles authorised thereunder, and the average number of vehicles per licence at 30th June, 1937, were as shown hereunder. For the purposes of comparison the position as it was on the 30th April, 1936, is also shown:—

	"A" licences (including short term.)		"A" Contract licences.		"B" licences (including short term).		"C" licences (including short term).		All licences.	
	30.4.36	30.6.37	30.4.36	30.6.37	30.4.36	30.6.37	30.4.36	30.6.37	30.4.36	30.6.37
No. of licences	1,751	1,660	149	258	3,119	3,143	15,218	16,655	20,237	21,716
No. of vehicles authorised :—										
1. Motor vehicles in possession	5,081	4,934	270	426	4,578	4,666	24,534	27,431	34,463	37,457
2. Motor vehicles to be hired	53	34	5	2	22	15	276	309	356	360
3. Trailers ...	426	447	6	13	94	109	466	617	992	1,186
4. Trade Plates	—	—	—	—	—	—	146	169	146	169
Average No. of motor vehicles in possession per licence ...	2.90	2.97	1.80	1.65	1.47	1.48	1.61	1.65	1.70	1.72

11. Of the 3,143 "B" licences current at 30th June, 1937, 1,132 were held by persons carrying on the trade of coal merchants and agents, 287 licences by farmers, dairymen and livestock dealers, and 238 by builders and builders' merchants. These licences authorised the carrying for hire or reward of general goods within a limited radius or specified classes of goods. Three hundred and twenty-one holders of "B" licences have declared that they do not carry on any trade or business other than that of hauling.

12. The number of persons holding licences of more than one class were:—

Holders of "A" and "B" licences	...	...	...	239
Holders of "A" and "C" licences	...	...	...	53
Holders of "B" and "C" licences	...	...	...	385
Holders of "A", "B" and "C" licences	...	...	...	33
Total				710

13. At the 30th September, 1937, the licences held by the Railway Companies authorised the undermentioned vehicles:—

	"A" Licences.		"A" Contract Licences.	
	Motor Vehicles.	Trailers.	Motor Vehicles.	Trailers.
Great Western Rly., Co. ... ..	625	239	12	—
London, Midland and Scottish Rly., Co. ... ..	66	37	—	—
Southern Rly., Co. ... ..	18	—	—	—
Total ... ..	709	276	12	—

14. Vehicles were authorised at the following new bases:—

*Great Western Rly. Co.:*—

Codford, Congresbury, Corsham, Hullavington, Keynsham, Looe, Penryn, St. Germans, Saltash, Shepton Mallet, Tiverton, Williton.

*Southern Rly. Co.:*—

Dorchester.

15. At the following base a vehicle ceased to be operated:—

*London Midland and Scottish Rly. Co.:*—

Stroud.

16. During the year, 80 "A" licences, 117 "B" licences and 1,344 "C" licences were surrendered. Of the "A" and "B" licences surrendered, in 127 instances the businesses were taken over by other operators.

17. The number of "A" and "B" licences in which one vehicle only was specified was reduced from 970 and 2,413 to 909 and 2,360 respectively during the period 30th April, 1936, to 30th June, 1937.

18. The number of "A" Contract licences issued under Section 7 (1) of the Act increased during the year from 149 to 258. They include 52 authorising the use of vehicles for the carriage of goods for Local Authorities.

19. Complaints have been received from "A" and "B" licence holders that work which they formerly did has been transferred to those who secured contracts by quoting lower rates.

*Objections to Applications.*

20. Objections numbering 1,415 were received in respect of 595 applications, as under:—

	No. of applications objected to by				No. of Objections.
	Railway Companies only.	Operators only.	Railway Companies and Operators.	Total.	
" A " new licences or renewals	55	10	27	92	220
" A " variations to licences ...	94	10	12	116	208
" B " new licences or renewals	169	45	61	275	654
" B " variations to licences ...	92	10	10	112	333
Total ... ..	410	75	110	595	1,415

21. Included in the applications opposed were 207 relating to entirely new services. Of these, 39 were for " A " licences and 168 for " B " licences.

*Public Inquiries.*

22. During the period under review, 75 Public Inquiries, occupying 78 days, were held at the following places:—

<i>Place.</i>	<i>No. of days.</i>
Bristol ... ..	34
Dorchester ... ..	5
Exeter ... ..	9
Gloucester ... ..	8
Plymouth ... ..	6
Salisbury ... ..	4
Taunton ... ..	5
Torquay ... ..	1
Truro ... ..	6

23. The average number of applications dealt with at each Inquiry was ten.

24. Greater care appears to be taken in the preparation of evidence in support of applications, but there is a real difficulty in securing the attendance at Inquiries of witnesses whose evidence might be very material, and consequently in many cases there are gaps in the evidence which create difficulties in arriving at equitable decisions.

25. Many of the applications provided for the substitution of motor vehicles for horses, such a change being necessary owing to traffic conditions, including modern road surfaces. For the same reasons the conveyance in motor vehicles of cattle to markets has much increased, necessitating additional vehicles.

*Appeals.*

26. Two appeals were shown as pending in the previous report, and during the year now under review two further appeals were lodged with the Appeal Tribunal. The nature of such appeals and the results were as follows:—

	<i>No. of Appeals.</i>	<i>Allowed.</i>	<i>Dismissed.</i>
Against refusal to grant licences or variations... ..	1	1	—
Against grant of licences or variations... ..	*3	1	*2

\* Two were appeals by two Railway Companies against the grant of one licence.

27. The two which were not dismissed were allowed in part only.

*Maintenance of Vehicles.*

28. In the last report reference was made to the progress which had been made by the larger operators in improving their maintenance facilities. Whilst in most cases this improvement has been maintained, in some there has been a lowering of the standard, which it is thought may be due to increased business and the consequent use of the vehicles for longer hours with less opportunity for attention.

29. There are still many operators who rely upon the Vehicle Examiners to point out defects in their vehicles and fail to make any attempt themselves to see that they are properly maintained, but some of the worst of these offenders have gone out of business.

30. A larger number of "C" licence vehicles have been examined and with few exceptions maintenance was found to be very much neglected. This especially applies to those owned by shopkeepers where the driver is only part-time engaged in connection with the vehicle.

31. During the year covered by the report the Examiners carried out 11,382 inspections, in respect of 8,448 vehicles. One thousand, seven hundred and ninety prohibition notices were issued (of which 421 came into force immediately) and of these 488 were in respect of "A" licence vehicles, 513 "B" licence vehicles, and 789 for vehicles authorised under "C" licences. The number of defects specified in each prohibition notice averaged five, and over the whole may be classified as follows:—

	<i>Per cent.</i>
Steering units ... ..	20·55
Springs ... ..	15·37
Body and fittings ... ..	11·61
Power unit and primary transmission ... ..	11·11
Footbrake ... ..	8·65
Handbrake ... ..	8·24
Front axle ... ..	6·06
Wheels ... ..	5·48
Chassis frame and fittings ... ..	5·38
Rear axle ... ..	3·35
Various ... ..	4·20

32. In addition to the normal examinations carried out, special organised checks were made at specific points with valuable results.

33. No appeals to the Certifying Officer or the Minister against the refusal to remove prohibitions were made, nor was there any complaint as to the manner in which the Vehicle Examiners carried out their duties.

34. Reports relating to 66 accidents, in which goods vehicles were involved, were received from the Police, as against 32 last year. These were fully investigated so far as the vehicles were concerned. Forty-three per cent. of the defects related to brakes and 21 per cent. to steering.

*Trailers drawn by Private Cars.*

35. The use of trailers drawn by private cars for the conveyance of goods in connection with trades or businesses carried on by the owners has increased to a large extent. As many as 80 such trailers were seen at one market and as they can be obtained of a size sufficient to carry livestock, many persons are able to provide their transport requirements without being subject to the restrictions attached to carriers' licences.

36. An increase was also observed in the number of retail traders who use private cars with boxes attached for the carriage of their goods.

*Enforcement.*

37. No carriers' licences were revoked or suspended, but a number of operators were warned that such action will have to be resorted to unless in future they comply strictly with the conditions of their licences.



38. Traffic Examiners and the Police reported 5,125 offences, of which 71.9 per cent. were against the Goods Vehicles (Keeping of Records) Regulations, 8.1 per cent. related to excess driving hours and 9.7 per cent. to the use of vehicles not authorised under licences. Warnings were given in 3,851 cases and in the remainder proceedings were instituted or are still under consideration.

39. Of the total number of reports of offences, 3,695 were made by the Traffic Examiners and 1,430 by the Police.

40. Of the offences prosecuted, 1,799 were instituted by the Licensing Authority and 439 by the Police.

41. Whilst in some parts of the Area the fines inflicted were too trivial to be of any deterrent value, in others, the Magistrates indicated a serious view of the offences. In one case of numerous offences of excess driving hours, fines amounting to £109 and £21 costs were inflicted; and in another the penalty amounted to £165 and £15 15s. costs. In the latter case, the offender appealed to the Court of Quarter Sessions against the amount of the fine, the result being that it was increased.

42. There are good grounds for believing that the falsifying of records is far from uncommon, and where there is collusion between employer and driver, evidence of offences is difficult to obtain. The difficulty is being surmounted, however, and when such offences are proved the most effective action will be to revoke the licences concerned, because, obviously, it is all to the advantage of the industry that such operators should be eliminated.

43. The following table gives particulars of the prosecutions instituted during the year:—

(1) Nature of offences.	(2) Persons concerned.	(3) Total offences.	(4) Convicted or dealt with under Probation of Offenders Act.	(5) Dismissed.	(6) Pending.
Operators:—					
Using goods vehicles without licences ... ..	285	307	261	2	44
Using goods vehicles whilst under prohibition ... ..	22	33	30	—	3
Causing or permitting persons to drive excessive hours ... ..	30	575	472	8	95
Records—offences in connection with ... ..	174	421	389	7	25
Employing unlicensed driver of Heavy Goods vehicle ...	23	23	21	—	2
Miscellaneous offences ... ..	95	121	112	5	4
Drivers:—					
Driving goods vehicles excess hours ... ..	14	63	27	5	31
Records—failing to keep or carry ... ..	604	668	583	26	59
Driving Heavy Goods vehicle not being so licensed ... ..	27	27	26	—	1
Total ... ..	1,274	2,238	1,921	53	264

44. Of the 126 summonses shown as pending in the previous report, convictions were secured in 125, the remaining case being dismissed.

#### *Drivers' Records.*

45. Twenty-four applications were received for dispensation from the requirements as to the keeping of drivers' records in accordance with the provisions of Section 16 (3) of the Act and Regulation 9 of the Goods Vehicles (Keeping of Records) Regulations. Five were granted and 19 refused.

*Wages and conditions of Employment.*

46. Since the last report, 15 complaints were made by drivers that the correct rate of wages was not being paid, and they were referred to the Joint Conciliation Board. From that Board eight cases were submitted, and were referred to the Chief Conciliation Officer of the Ministry of Labour. In three of these, agreement was reached, and the others are still under consideration.

47. Of the 26 cases shown as outstanding at the 30th September, 1936, 11 have since been withdrawn, agreements having been reached. The remainder have not yet been disposed of.

*Licences to drive Heavy Goods Vehicles.*

48. Applications outstanding on the 30th September, 1936, for licences to drive heavy goods vehicles numbered 169, and during the period covered by this report, a further 3,512 were received. Of these, 3,171 were granted, 137 refused and 149 withdrawn. The remaining 224 were under consideration at the end of September and in respect of 169 of them provisional licences had been issued. In all, 732 provisional licences were granted. No appeals were made to Courts of Summary Jurisdiction against the decisions on these applications.

49. The number of driving tests carried out by the Vehicle Examiners on applications for licences was 700. Applicants numbering 517 passed on the first test, and 17 of those who failed withdrew their applications. Seventy-one who failed on the first test were passed at a second test, and 12, having failed in two tests, were refused licences. In addition, driving tests were given to 18 applicants who desired to drive vehicles of classes other than those specified in their licences. The number of driving tests given by other persons authorised to carry out tests was 225.

50. Prosecutions under Section 31 of the Road Traffic Act, 1934, for driving without a licence, or employing drivers who were not licensed, numbered 50 as compared with 48 for the previous year.

I desire to express my thanks to the Police for their assistance and co-operation, and to those Local Authorities who have kindly provided accommodation for the Public Inquiries.

I have the honour to be, Sir,

Your obedient Servant,

A. F. NICHOLSON,

Licensing Authority.

## SOUTH-EASTERN TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to submit my report as Licensing Authority for the South-Eastern Traffic Area in pursuance of the provisions of sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933, for the 12 months ended 30th September, 1937.

2. I have found it possible to deal with the necessary work arising at Public Inquiries during the year without calling upon the Deputy Licensing Authority, Colonel R. T. G. Tangye, O.B.E., LL.B., B.A., for assistance. I pointed out in my last report how valuable this assistance had been in dealing with the first spate of applications for licences under the provisions of the new Act.

3. Ninety-one Public Inquiries for the hearing of applications for carriers' "A" and "B" licences and for the variation of these classes of licence have been held during the year at various centres in the Area as indicated below. The total number of cases dealt with at these Inquiries was 1,550, including 237 applications for the variation of licences.

The places at which Public Inquiries have been held are as follow:—

Bournemouth	...	...	...	...	...	...	8
Brighton	...	...	...	...	...	...	12
Canterbury	...	...	...	...	...	...	8
Chichester	...	...	...	...	...	...	4
Hastings	...	...	...	...	...	...	1
Lewes	...	...	...	...	...	...	3
London	...	...	...	...	...	...	9
Maidstone	...	...	...	...	...	...	13
Reading	...	...	...	...	...	...	12
Ryde (I. of W.)	...	...	...	...	...	...	1
Southampton	...	...	...	...	...	...	13
Winchester	...	...	...	...	...	...	7
							—
Total	...	...	...	...	...	...	91
							—

4. The tables which follow (Table I and Table II) give in summary form the number of applications of various kinds which have been received during the year from operators in the South-Eastern Area and show the manner in which they have been disposed of:—

TABLE I.—*Applications for Carriers' Licences.*

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			With-drawn.	Granted.	Refused.
<b>"A" Licences:—</b>					
Currency Period	30	939	27	832	19
Short Term, Section 3 (3)	—	15	1	13	1
Contract	—	137	—	136	1
<b>"B" Licences:—</b>					
Currency Period	50	3,330	60	3,095	23
Short Term, Section 3 (3)	—	18	—	18	—
<b>"C" Licences:—</b>					
Currency Period	189	9,476	—	9,549	—
Short Term, Section 3 (3)	—	85	—	85	—

Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ...	"A"	"B"	"C"
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ...	1	—	3
Short Term Administrative Licences issued (Section 3 (4)) ...	4	3	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ...	65	329	—
	102	34	—

TABLE II.—Applications for variation of Carriers' Licences.

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles					
"A" Licences :—					
Published and dealt with at Inquiry ... ..	10	787	7	90	11
Published but determined without Inquiry ... ..			—	266	—
Not published ... ..			—	417	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	20	1,208	21	118	23
Published but determined without Inquiry ... ..			—	325	—
Not published ... ..			—	730	—
Variations of Conditions attached to B Licences ...	3	52	1	34	18

The fact that the first three-year currency period for "C" licences expired on 30th June, 1937, explains the high total, 9,476, in Table I of applications received during the year for new licences in that class. Similarly the number of applications for new "A" licences is high compared with the corresponding figure for the year 1935-36 (939 as against 294) because during the year a large number of "A" licences expired which had been granted for the full currency period of two years following a short period "administrative" licence of one to 12 months.

The applications for variations of licences which are classified in Table II as "not published" (417 in respect of "A" licences and 730 in respect of "B" licences) relate almost exclusively to the replacement of a vehicle specified on the licence by another of substantially the same unladen weight and carrying capacity—see the proviso to Section 10 (2) of the Act.

5. The following figures show the position in the South-Eastern Traffic Area at 30th June, 1937:—

TABLE III.—Number of Licences of each class, number of vehicles authorised thereunder, and average number of vehicles per licence in the South-Eastern Traffic Area at 30th June, 1937.

	"A" Licences (including short term).	"A" Contract	"B" Licences (including short term).	"C" Licences (including short term).	All Licences.
No. of licences ... ..	1,272*	189	3,173	16,777	21,411*
No. of vehicles authorised—					
(i) Motor vehicles in possession	4,275*	455	5,764	28,724	39,218*
(ii) Motor vehicles to be hired	34	—	22	590	646
(iii) Trailers in possession or to be hired ... ..	536*	26	147	705	1,414*
(iv) Trade plates ... ..	—	—	—	213	213
Average No. of Motor vehicles in possession per licence ...	3.36	2.41	1.82	1.71	1.83

\* These figures include 3 licences granted to two Railway Companies (the Southern Railway and the Great Western Railway) covering the use of 289 motor vehicles and 96 trailers.

Of the holders of "A" licences, 661 were the owners of one vehicle only and 205 of two vehicles only. Similarly in the "B" class, 1,808 licensees were owners of one vehicle only and 586 were owners of two vehicles only.

The number of persons holding licences of more than one class were:—

Holders of " A " and " B " licences	...	...	...	...	...	...	...	87
Holders of " A " and " C " licences	...	...	...	...	...	...	...	34
Holders of " B " and " C " licences	...	...	...	...	...	...	...	407
Holders of " A ", " B " and " C " licences	...	...	...	...	...	...	...	26
Total	...	...	...	...	...	...	...	<u>554</u>

6. The number of applications for permission to use a vehicle under a " C " licence for carrying goods for hire or reward (Section 2 (4) of the Act) during the period under review was 11 as against 12 in the previous year. In all cases the applications were in connection with the carrying of mails at Christmas time for the General Post Office. One application was refused on the ground that the operator concerned already held a " B " licence for a suitable vehicle: the work was in fact carried out by the vehicle specified on the " C " licence, but it was not possible to take proceedings owing to the lack of the necessary evidence.

As in the past, Postmasters have been asked to make arrangements for this emergency work to be done, so far as possible, by holders of " A " or " B " licences.

7. Both " A " and " B " administrative short-term licences have been issued during the year in order to improve the " spread-over " of expiry dates. They have also been issued on occasion in cases where a business has been taken over, or where proposals have been submitted for taking over a business, and the information available was not sufficient to satisfy me that the transaction was a *bona fide* one, or that the business which it was proposed to acquire had any substantial goodwill attaching to it. In such cases it has been necessary for me to advertise the application and to investigate the matter more fully at a Public Inquiry, an administrative short-term licence being granted in the meantime without prejudice to the decision on the substantive application. Further investigation has in a number of cases shown up the transaction as a mere attempt to buy up a " carrier's licence " belonging to a man whose business had become derelict, and whose vehicles were largely out of use or had even been scrapped.

There is no desire to put obstacles in the way of genuine sales, transfers or amalgamations of haulage businesses, but operators who are on the look-out for opportunities of snapping up moribund businesses as a means of extending the scope of their own licences need to be reminded that Section 21 of the Act of 1933 specifically provides that licences, as such, " shall not be capable of being transferred or assigned ". A business that has become moribund is no longer meeting any real public need.

8. The number of objections considered at Public Inquiries during the year has been as follows:—

" A " licences.

Objections to applications for the grant or the variation of a licence	...	...	...	...	...	...	...	164
--	-----	-----	-----	-----	-----	-----	-----	-----

" B " licences.

Objections to applications for the grant or the variation of a licence	...	...	...	...	...	...	...	679
--	-----	-----	-----	-----	-----	-----	-----	-----

843

This total of 843 was divided as between railway company objections and objections by other persons providing transport facilities, as follows:—

Objections by railway companies	...	...	...	...	...	...	...	641
Objections by other carriers	...	...	...	...	...	...	...	202

843

The great majority of the objections lodged are still on behalf of one or other of the two railway companies operating in the South-Eastern Area, but as I anticipated in making my last report the past year has produced a higher proportion of objections on the part of other road operators. There has also been a greater volume of direct oral evidence at Public Inquiries, both by traders in support of applications for licences or for extensions of licences, and by objectors to the applications. The total number of objections lodged during the year under review has been 843 as against 1,632 during the previous year. But the issues have been more complex and they have taken longer to determine.

#### *Appeals.*

9. Five appeals to the Appeal Tribunal were outstanding on 30th September, 1936. Of these, one was abandoned and the other four were dismissed.

During the year four fresh appeals have been received and determined by the Tribunal. One appeal against the refusal to grant an "A" licence was allowed, in two cases my decision on points of detail was modified, and the remaining appeal was dismissed. There were no appeals outstanding on 30th September, 1937.

There have been no appeals to Courts of Summary Jurisdiction under Section 31 (8) of the Road Traffic Act, 1934, against the refusal to grant a licence to drive a heavy goods vehicle or the suspension or revocation of such a licence.

#### *Maintenance of goods vehicles.*

10. Goods vehicles are becoming more roadworthy throughout the area. The improvement, though slow, is apparent.

The inspection of vehicles by the vehicle examiners, and the imposition where necessary of "prohibition" orders, has an effect beyond the immediate circle of the vehicle owners affected. The fact that the use of a vehicle has been prohibited circulates round the district and operators who up to the present have escaped inspection are disposed to devote more attention to the maintenance of their vehicles in anticipation of a visit from an examiner.

11. During the year the Vehicle Examiners carried out 12,851 inspections. The number of "prohibition" orders issued during the year totalled 1,460. Of these, 452 had immediate effect on the ground that the vehicles were in an actively dangerous condition, and 1,008 were delayed prohibitions which allowed the operator a few days in which to carry out necessary repairs to the satisfaction of the examiner.

12. The class of vehicle most frequently prohibited is the open lorry under 50 cwts. in unladen weight. These vehicles, when loaded to their advertised capacity, are not robust enough for the strenuous work which they are often called upon to perform, and effective maintenance after a few months' hard use becomes increasingly difficult.

There is a sustained demand for vehicles of this type, between 40 cwts. and 50 cwts. in unladen weight, owing to the fact that they fall within the class to which the higher speed limit of 30 m.p.h. applies. The increasing tendency on the part of chassis manufacturers to push up the advertised payload capacity has, in the opinion of my certifying officer, resulted in reducing the safety factor of vital components to an unwise degree.

#### *Licences to drive heavy goods vehicles.*

13. The position as at 30th September, 1937, with regard to the issue of licences to drive heavy goods vehicles was as follows:—

Applications outstanding at 1st October, 1936	...	44
Applications received during the year ended		
30th September, 1937	... ..	4,708
		<hr/>
		4,752

Number of licences issued	...	...	...	...	4,555
Number of applicants who failed test	...	...	...	...	39
Applications refused on other grounds	...	...	...	...	6
Applications withdrawn	...	...	...	...	97
Number of licences revoked	...	...	...	...	5
Applications still in action	...	...	...	...	50
					4,752
Number of licences issued up to 30th September, 1936	...	...	...	...	9,554
Add as above for 1937	...	...	...	...	4,555
					14,109
Total	...	...	...	...	14,109

The number of applicants tested by the Vehicle Examiners was 825, of whom 83 failed to pass the first test. Forty-four of the latter passed a subsequent test and 39 failed. The number of applicants tested and passed by other persons authorised to carry out the tests was 62.

Five licences to drive heavy goods vehicles were revoked, four of these on account of unsatisfactory conduct as a driver and one on the ground of physical disability.

#### *Wages and conditions of employment.*

14. The machinery laid down in the Act of 1933 for securing, in individual cases, the payment of "fair-wages" has been set in motion in one fresh case during the year under review. This case is still in the hands of the Conciliation Officer of the Ministry of Labour.

The case which was outstanding at 30th September, 1936, was settled, on the intervention of the Conciliation Officer, by the operator giving an undertaking to observe fully the terms of the provisional agreement arrived at in 1935 by the South Eastern Area Joint Conciliation Board.

15. These meagre results are due to the breakdown in the conciliation machinery to which I referred in my last annual report. I can only repeat the view which I then expressed that until some generally accepted standard of fair wages and conditions of employment for workers engaged in the transport of goods by road can be secured the very elements of fair competition between operator and operator, or between road and rail, are lacking. Fortunately legislation is now promised following the issue of the Report of the Committee, of which Sir James Baillie was Chairman, on the Regulation of Wages and Conditions of Service in the Road Transport Industry (goods). It must be the wish of every reputable road operator that this legislation may be speedy and effective.

#### *Enforcement.*

16. I have found it necessary during the course of the year to take proceedings against 94 persons (i.e. 65 operators and 29 drivers) for various offences in connection with the use of goods vehicles. One thousand, one hundred and seventy-one summonses were issued on which 830 convictions were secured, 341 summonses being dismissed, withdrawn (as being alternative summonses) or otherwise disposed of. In the same period Chief Officers of Police are known to have taken proceedings against 249 persons (i.e. 171 operators and 78 drivers), issuing 294 summonses on which 245 convictions were secured, the remaining 49 summonses being dismissed, withdrawn or otherwise disposed of.

Details are given in the following table:—

Offence.	Number of Summonses	Convictions.	Withdrawn.	Dismissed.
Using an unlicensed vehicle ... ..	128	96	6	26
Excessive hours of driving ... ..	722	623	59	40
Failing to keep, or cause to be kept, proper records ...	487	259	182	46
Failing to comply with the conditions of a licence ...	47	27	1	19
Using a vehicle whilst under prohibition ... ..	16	15	—	1
Using a vehicle in defective or dangerous condition...	57	47	—	10
Failing to display identity certificate ... ..	8	8	—	—
Total ... ..	1,465	1,075	248	142

As in previous years many apparent offences are dealt with by warnings, given either by letter, or at a Public Inquiry, or by a personal visit on the part of an Examiner.

17. During the year 18 holders of licences have been summoned to Public Inquiries to show cause why their licences should not be suspended or revoked. Of these, eight were holders of ordinary "A" licences, two were holders of "A" (Contract) licences, seven were holders of "C" licences and one was the holder of a "B" licence. In each case this action followed conviction in the courts for offences under the Traffic Acts. These were in the main offences involving excessive hours of driving in contravention of the provisions of Section 19 of the Act of 1930 as amended by subsequent enactments.

In one case I found it necessary to revoke an "A" licence, in two other cases "A" (Contract) licences were suspended for a fortnight for persistent disregard of the conditions subject to which they had been issued, and in one case a "C" licence held by a firm of brewers was suspended for a week.

18. By degrees the unpalatable fact is being brought home to certain classes of operators of road vehicles that when Parliament placed Section 19 of the Road Traffic Act, 1930, on the statute book, with its restrictions on excessive hours of driving, it was the intention of the Legislature that those provisions should become effective, on grounds of public safety if for no other reason. This Section of the Act came into force on 1st April, 1931, and the widespread disregard of its provisions during the five or six years which followed, apart from the menace to public safety involved, has subjected reputable road hauliers and the railway companies to entirely unfair competition.

The position is improving in this Area, but is still far from satisfactory. The attention which is being paid to the records kept by drivers of goods vehicles is having a salutary effect, but unfortunately it has also undoubtedly had the effect in certain cases of inducing unscrupulous operators and drivers, the latter often under fear of dismissal, to make false entries in the records kept by them. The employment of relief drivers, however, on the longer journeys, or on return journeys, is certainly extending, and there is a much more general appreciation of the effect of the provisions of the Act in the matter of hours of driving. As was noted in my previous reports, certain classes of operators under "C" licences, such as retail distributors and shopkeepers, or the owners of businesses where the driver acts as roundsman or salesman, have been among the worst offenders in causing or permitting excessive hours of driving. In some cases this has been done in sheer ignorance of the provisions of the Act. But by now ignorance can rarely with any justification be pleaded as an excuse.

#### General.

19. During the year to which this Report relates I have been able almost to complete my investigation at Public Inquiries of applications by all holders of "A" or "B" licences in my Area. By the end of the calendar year I hope to have passed them all under review.



To myself, as Licensing Authority, it has been of the greatest advantage to be able to complete at any rate a preliminary survey of all the facilities for the carrying of goods by road for hire or reward in the Area, by personal inquiry into the business of the licence holders.

20. During the course of this survey I have found that a substantial number of operators, to whom "A" licences had been granted on their original application submitted in 1934, were not entitled to "A" licences at all and should have been operating under "B" licences. This was particularly true of small local hauliers with one or two vehicles. On inquiry it was discovered that in many cases, as was naturally to be expected, they also carried on a small trading business which involved the occasional use of the vehicles specified on their licence. In these cases the application has been re-advertised as one for a "B" licence with such conditions attached to it, in respect of the carrying of goods for hire or reward, as would not unduly restrict the character of the general haulage which they had been accustomed to carry out in the past, while at the same time leaving them free to use their vehicles for the purpose of their own private trading. An unreasoning prejudice in favour of an "A" licence had led many of these small operators to put themselves to considerable inconvenience in the conduct of their own trading, in order to preserve inviolate the character of their lorry as a vehicle for carrying the goods of others for hire or reward.

21. I have been impressed by the financial insecurity of many of the haulage businesses in the Area. Apart from actual bankruptcies and compositions with creditors, which come to one's notice with rather startling frequency, a considerable number of small hauliers have simply dropped out of business during the past year. One of the unfortunate features of these failures is that in an effort to get business at any price a man may do a vast amount of harm to other carriers of goods in his district before he is himself finally submerged in the morass of insolvency. In ordinary business a man usually knows, approximately at any rate, the cost to himself of the goods in which he is trading. But in the industry of transport by road it is still true that a very large number of operators have no idea of the true cost to themselves of the commodity which they are offering to the public. That a number of these men will be forced to keep some form of accounts, with reasonable allowances for depreciation and maintenance, may well prove to be not the least of the benefits accruing from the licensing system set up by the Road and Rail Traffic Act, 1933.

22. The Clerk and the staff attached to my office have continued to render me loyal and effective assistance, and I wish once more to place on record my appreciation of their services.

I have the honour to be.

Sir,

Your obedient Servant,

HENRY H. PIGGOTT,

Licensing Authority.

## METROPOLITAN TRAFFIC AREA

To the Minister of Transport.

SIR,

I. I have the honour to present my Report for the period ending 30th September, 1937, as Licensing Authority for the Metropolitan Area, in accordance with Section 23 of the Road and Rail Traffic Act, 1933.

My two previous Reports dealt with the introduction of the licensing control of goods vehicles, the issue of the original "A" and "B" carriers licences, and the first renewal of "B" licences. Although "B" licences, which have a currency period of a year, had become renewable during the period covered by my second Report, the first two years currency period of "A" licences had not commenced to expire until the eve of the period covered by the present Report, when the first block of 1,500 "A" licences fell due for renewal on 30th September, 1936. Renewal applications were received in respect of 1,261 of these, but licences relating to 826 of them were, under the arrangements for "spread over," not issuable until November or December, and are therefore included in the licences granted during the period of this Report. The total applications received during the year ending 30th September, 1937 (including applications outstanding from the previous period) were:—for Public Carriers "A" licences 5,275, for Limited Carriers "B" licences 6,105, and for Private Carriers "C" licences 20,131. Applications for renewal of "A" and "B" licences are due two months before the date of expiry, and therefore a number of the applications for "B" licences were necessarily outstanding on 30th September, 1937, but except for a few applications in respect of new carriers, all the "B" licence applications outstanding at 30th September, 1937, were in respect of licences renewable at a later date. The consideration of applications, and the issue of licences of all classes are actually well up to date. Particulars of all the above applications for licences, and for variation of licences, are contained in the following tables showing the disposal of the applications:—

TABLE I.—*Applications for Carrier's Licences.*

Nature of application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.			
			Withdrawn.	Granted.	Refused.	Dismissed for lack of prosecution
<b>"A" Licences :—</b>						
Currency Period ... ..	868	3,182	139	3,686	53	39
Short Term, Section 3 (3) ... ..	6	87	2	76	2	—
Contract ... ..	100	1,032	38	1,049	—	—
<b>"B" Licences :—</b>						
Currency Period ... ..	620	5,462	153	4,718	91	94
Short Term, Section 3 (3) ... ..	3	20	1	19	1	—
<b>"C" Licences :—</b>						
Currency Period ... ..	158	19,665	216	19,424	—	—
Short Term, Section 3 (3) ... ..	—	308	—	308	—	—
Applications (included above) in respect of which a holding Company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..				"A"	"B"	"C"
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..				2	2	142
Short Term Administrative Licences issued (Section 3 (4) ) ... ..				28	15	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... ..				251	25	—
				214	37	—

TABLE II.—Applications for variation of Carriers' Licences.

Nature of variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.			
			Withdrawn.	Granted.	Refused.	Dismissed for lack of prosecution.
<b>Variations relating to Vehicles.</b>						
<b>"A" Licences :—</b>						
Published and dealt with at Inquiry	136	3,114	25	153	68	16
Published but determined without Inquiry			67	280	—	—
Not published			—	2,559	—	—
"A" Contract licences	—	473	—	473	—	—
<b>"B" Licences :—</b>						
Published and dealt with at Inquiry	95	1,677	18	149	18	8
Published but determined without Inquiry			25	168	—	—
Not published			—	1,340	—	—
Variations of Conditions attached to "B" Licences	16	128	19	90	16	3
"C" Licences (Variations)	722	14,966	122	15,555	—	—

### Objections.

2. In my previous Report I gave particulars showing to what extent applications for grant and renewal of licences, and for variation of licences, had been opposed by those entitled to lodge formal objection under the Act. Many applications received are of a character such that no objection could be made, e.g. applications for replacement of vehicles by vehicles of unladen weight not exceeding the unladen weight of the vehicles replaced, or applications which could be regarded as trivial, but in order to get a true picture of the percentage of applications which, under the principles of the Act, are in practice the subject of objection, it has been necessary to have regard to all applications, including those which were not liable to objection, and those which were treated as trivial. I have, however, thought it desirable to exclude short term applications which owing to their nature cannot usually be published, and are not therefore subject to objection. On this basis the percentages are as follows:—

Application for.	Percentage of applications (excluding short term applications) in which objections were lodged and pursued.	
	"A" applications.	"B" applications.
New licence	66	56
Renewal of licence	5	4
Variation of licence :—		
Vehicles	9	6
Conditions	—	85

The percentage of objections is generally smaller than last year and the table shows that, apart from new applications, only a small percentage of applications for renewal, or for variation by substitution or addition of vehicles, are opposed. In arriving at the figures of 5 per cent. in the case of renewal of "A" licences, and 4 per cent. in the case of renewal of "B" licences, all applications for renewal where additional or larger vehicles are applied for at the time of renewal are included.

*Public Inquiries.*

3. During the period under review a total of 188 Public Inquiries on 189 days have been held by me and by the Deputy Licensing Authority, Colonel R. T. G. Tangye, O.B.E., LL.B., B.A., whose valuable collaboration has been of very great assistance to me. The number of days occupied by Public Inquiries has been the same as last year, although in the year under review "A" licences as well as "B" licences have fallen due for renewal, whereas in the previous year only "B" licences and very few "A" licences were renewable. It was possible to deal with all renewals without increasing Public Inquiries because the conditions of "B" licences had been generally stabilised in the previous years, so that it was only necessary during the current year to review such conditions in comparatively few cases which required to be dealt with at a Public Inquiry. During the course of renewal of "A" licences it was found that large numbers of vehicles which had been authorised as "claimed tonnage" under Section 7 of the Act had not been required by the holders of the licences, so that the vehicles had never been specified in the licences, or if specified, road fund tax had not been paid on them and they had not been used. This will be again referred to, further on in the Report. The power under Section 10 (3) of the Act to remove from licences, during the currency of the licences, vehicles which had ceased to be used, has only been exercised in 12 cases, a total of 23 vehicles being removed in this way. This jurisdiction has hitherto only been exercised sparingly, and generally in exceptional cases, as I was anxious that the full rights of "claimed tonnage" should be enjoyed, and even where claimed tonnage rights did not exist, licence holders should not be deprived of vehicles merely because of a loss of business which might prove to be temporary.

*Use of "C" Licence Vehicles for Hire or Reward in Emergency.*

4. Under the provisions of Section 2 (4) of the Act, I have authorised the use of 36 "C" licence vehicles for the carriage of goods for hire or reward in cases of emergency. These were all on applications for authority to carry Post Office mails and parcels on "C" licence vehicles during the Christmas period 1936. In each case I required, as in previous years, a certificate in writing from the Head Postmaster of the district that all practicable steps had been taken to procure the services of the holders of "A" and "B" licences, but that, in the absence of a sufficient number of "A" and "B" vehicles, it was necessary to employ a "C" licence vehicle. In each case also, I made it a condition of granting authority to use a "C" licence vehicle, that the holder of the licence should, for the period of the authority, pay to the driver the wages which would be payable by the holder of an "A" or "B" carrier's licence.

*Vehicles transferred from "B" Licences to "C" Licences.*

5. Further evidence has become available to show, as suggested in my last Report, that in certain cases where holders of "B" licences have surrendered them, and applied for "C" licences, the motive has been to obtain the lower insurance rates applicable to "C" licence vehicles, and in some cases letters received from the owners of the vehicles have explained that this was the reason.

*Trailers drawn by Private Cars.*

6. The use of private cars, and trailers drawn by private cars, for the carriage of goods in order to avoid the necessity for "C" carriers licences appears to be on the increase. No records are available of the number of cases in which this is done, and the tendency for the practice to increase can only be judged from an increase in the number of inquiries made to the office to ascertain whether carriers licences are necessary to authorise the use of such vehicles. It is, of course, probable that the number of cases in which inquiry is made is only a small proportion of the total number of cases in which the need for carriers licences is obviated in this way.

*Contract "A" Licences.*

7. The number of vehicles authorised by contract "A" licences has shown an increase during the year. The number of applications received during the

period of my last Report was 916 for contract "A" licences, and 335 for variation of such licences whereas the number received during the present year was 1,032 for contract "A" licences, and 463 applications to vary such licences. At 30th September, 1936, there were 2,582 vehicles authorised by 1,313 contract licences in the Metropolitan Area, and at 30th September, 1937, there were 3,178 authorised by 1,748 contract licences.

I am seriously perturbed at the increasing evidence of the abuse of the provisions of the Act relating to licences of this class. There is no doubt that a genuine need exists for vehicles to be authorised under this procedure in proper cases, but there is equally no doubt that advantage is being taken of the contract licence procedure to operate vehicles which ought not to be operated in the absence of evidence to prove need in the ordinary way in which need has to be proved to justify the grant of an ordinary "A" licence. Unfortunately the consequences of this abuse often inflict serious loss on competitors who were prior holders of licences authorising them to use vehicles which they have provided at considerable expense, and which are now on their hands without employment. The ease with which contract "A" licences can be obtained results also in a number of applications for such licences from the more irresponsible type of vehicle operator who is more liable to act illegally, or who finds himself unable to enforce any obligation of the person with whom he has entered into a contract for the use of the vehicle provided, and who in desperation uses the vehicle in breach of the conditions of the licence by carrying goods for another employer. Whenever such illegal use is discovered, it will be essential to punish it severely in all cases where it can be proved. The difficulties of proof of such offences are, however, obvious, and it is of the very greatest importance that the opportunity and temptation to commit offences of this character should be reduced to a minimum. Whatever doubt there may be, at the time when a licence is granted, whether the licensee will use the vehicle properly, and observe the conditions of the licence, there is not usually any ground, unless a previous licence has been revoked, which would justify the Licensing Authority in holding that an applicant will not perform the conditions. The chief safeguard is provided by an obligation imposed by the contract that the person entering into the contract with the licensee will use the vehicle during the period of the contract.

#### *Appeals.*

8. At the date of my last Report four appeals were outstanding and had not been decided. During the current year nine appeals have been lodged, although four of these were by different objectors against one grant, viz., the grant of a licence on renewal to Bouts Tillotson, Ltd. Of the total of 13 appeals, eight were dismissed, one was withdrawn, orders were made in respect of two, and two are still outstanding.

#### *Applications under Section 11 (3) (b).*

9. The provisions of the Act which enable a Licensing Authority to grant without publication, an application for vehicles authorised to be used for the purpose of a business which the applicant has acquired or intends to acquire, have proved to be useful, and it has been possible to grant a number of applications without publication in cases of death, and of formal or administrative transfers of business. There have, however, been many cases where attempts have been made to induce Licensing Authorities to dispose of applications under this procedure where the applications did not result from genuine purchases of goodwill of businesses, but were really fraudulent attempts to acquire carriers' licences in substitution for licences held in respect of businesses which had ceased to exist, and which represented no goodwill whatever. It has been necessary to refuse very definitely to allow the procedure of Section 11 (3) (b) to be used in any case where it was not clear that there was a genuine transfer of a business in which the vehicles to which the application related were reasonably fully employed. Even in cases where it is established that there is a genuine sale of goodwill, it is sometimes advisable to hold a Public Inquiry to enable the Licensing Authority to satisfy himself as to the effect of the change of interests in the business. It has, however, generally proved

possible to grant licences without publication or Public Inquiry on applications made by personal representatives or successors in title of deceased licence holders, or on the transfer of businesses by licence holders to relatives, or on the formation of companies for personal reasons as distinct from the introduction of fresh capital. In the case of sales to other persons or companies introducing new capital, it is generally found necessary to investigate the circumstances fully, and for that purpose to publish notice of the applications in order to guard against attempts which have frequently been made to acquire licences by pretending to purchase derelict businesses, where need for new licences or additional vehicles did not exist.

In a number of cases evidence was discovered of conspiracy to effect the unlawful use of public carriers licences, and to cause the unlawful use of vehicles under carriers licences, where the holders had ceased to use the vehicles authorised by the licences, and had gone out of business. In order to check this practice certain persons were recently prosecuted for conspiracy and convicted at the Central Criminal Court.

#### *Maintenance of Vehicles.*

10. The Vehicle Examiners have, during the period covered by this Report, carried out 27,551 inspections of goods vehicles and have issued 3,345 notices under Section 17 (3) of the Road and Rail Traffic Act, 1933, prohibiting the use of vehicles which were or were likely to become unfit for service. In 2,081 of these, where the defects did not involve immediate risk, the notices were issued to come into operation after the expiration of periods varying from one to ten days unless in the meantime the Examiners were satisfied that the defects had been, or were in course of being, remedied. In the remaining 1,264 it was necessary to prohibit the use of the vehicles forthwith. There have been no appeals against the Vehicle Examiners' decisions. Where vehicles are prohibited, a second, and sometimes a third examination, of the same vehicle is necessary, and included in the figure of 27,551 inspections are 3,556 second inspections and 439 third inspections of the same vehicle. Of the vehicles which were prohibited 240 were scrapped or removed from the road while under prohibition. As in previous years the chief defects related to steering, which represented more than 33 per cent. of all defects reported. Defective springs accounted for approximately 20 per cent. and defective brakes for over 14 per cent.

Although the general maintenance of goods vehicles has improved, and the worst operators are being eliminated by economic or other factors, while the licensing control tends to prevent the recruitment of the irresponsible, there is still very great need for improvement. One of the biggest faults continues to be the practice of overloading, particularly of vehicles under 50 cwt. unladen weight.

#### *Licensing of Drivers of Heavy Goods Vehicles.*

11. The number of drivers of heavy goods vehicles who have passed (a) tests conducted by the examiners of firms and companies employing not less than 250 drivers whose certificates are accepted for tests of drivers to be employed by them, and (b) tests conducted by Army and Royal Air Force examiners who are authorised by me to test drivers leaving the Army and the Royal Air Force, were 916, of whom 283 were also tested and granted certificates under Section 6 of the Road Traffic Act, 1934, for ordinary drivers licences. The great majority of applicants for heavy goods vehicle drivers licences who had to be tested, were tested by the Vehicle Examiners, who conducted 3,657 tests. Of these 209 were also tested for an ordinary driver's licence under Section 6 of the Road Traffic Act, 1934. The number who failed to pass the dual test was 37 (18 per cent.) and the number who failed in the test for heavy goods drivers licences only—who naturally had longer experience—was 396 (11 per cent.).

The detailed results of the tests, and the particulars of applications for, and grants of heavy goods drivers licences are set out below. It will be seen that the total number of these licences issued during the year was 19,099, and that the number of substantive heavy goods vehicle driving licences current in the Metropolitan Area is 47,447.

*Driving Tests conducted by Area Vehicle Examiners.*

	Passed test.			Failed test.		
	Sec. 6 and 31.	Sec. 31 only.	Total.	Sec. 6 and 31.	Sec. 31 only.	Total.
<b>For licence</b>						
First tests ... ..	161	2,736	2,897	35	352	387
Re-tests :—						
First ... ..	9	130	139	2	18	20
Second ... ..	2	6	8	—	3	3
Third ... ..	—	4	4	—	1	1
<b>Total ... ..</b>	<b>172</b>	<b>2,876</b>	<b>3,048</b>	<b>37</b>	<b>374</b>	<b>411</b>
<b>For additional classes</b>						
First tests ... ..	—	168	168	—	19	19
Re-tests :—						
First ... ..	—	7	7	—	1	1
Second ... ..	—	—	—	—	1	1
Third ... ..	—	1	1	—	1	1
<b>Total ... ..</b>	<b>—</b>	<b>176</b>	<b>176</b>	<b>—</b>	<b>22</b>	<b>22</b>
<b>Grand Total ... ..</b>	<b>172</b>	<b>3,052</b>	<b>3,224</b>	<b>37</b>	<b>396</b>	<b>433</b>
				18%	11%	12%

*Licences to drive heavy goods vehicles.*

No. of applications.	First applications.	Renewal applications.	Total.
Received (including applications outstanding from previous year) ... ..	10,883	13,100	23,983
Granted, and licences issued ... ..	6,195	12,904	19,099
Refusals notified (failed test) ... ..	395	—	395
Withdrawn ... ..	2,665	—	2,665
Still in action ... ..	(a) 1,628	(b) 196	1,824

The number of refusals to grant a licence owing to failure to pass a driving test is less than the total number of failures, because an applicant is not refused a substantive licence until the expiration of his provisional licence, and during the currency of the provisional licence it may be that an applicant fails to pass the test on more than one occasion.

No. of substantive driving licences current ... .. 47,447

(a) Provisional licences had been issued in the great majority of the 1,628 first applications "still in action".

(b) The 196 renewal applications "still in action" related to licences which did not expire until some date later than 30th September, 1937.

*Enforcement.*

12. A very great amount of work has been done in enforcing the provisions of the Act. The number of operators of goods vehicles is very great, and it is not possible to take a short view of the education of operators in the whole range of their responsibility, including the maintenance of vehicles, the hours and conditions of employment, the keeping of drivers' records, and the other conditions attached to licences. Improvement has undoubtedly taken place, but it is necessary that the rate of improvement in the future must be greatly accelerated. There is still very widespread ignorance, or lack of appreciation, of the seriousness of offences. Both Vehicle Examiners and Traffic Examiners have spent, and are still spending, a large amount of time in guiding vehicle owners and instructing them in the nature and extent of their responsibilities, and it will always continue to be necessary that Examiners and all who are charged with the duty of enforcing the law should recognise that it is better to prevent offences than to punish them. It must be realised, however, that ignorance which may be excusable for a time on the introduction of new legislation, ceases to be excusable at a later period.

In a very large number of cases where offences have been revealed by inspection of drivers' records, warnings have been issued, and in many cases where the default has been due to misunderstanding, the matter was dealt with by merely giving advice.

In my last Report I drew attention to numerous cases in which it has been proved to Magistrates that drivers have been employed for excessive hours on a number of occasions by the same employer, and yet very small or nominal penalties have been inflicted, or the charge has been dealt with under the Probation of Offenders Act. It is not desirable to build up large numbers of summonses against each defendant, and it would not generally be practicable to do so, because of the very great expense involved. Even where a moderate number of offences are charged, Magistrates frequently deal with only a few and dismiss the remainder unheard. As I stated in my last Report, decisions in prosecutions are given by the Courts which have heard the evidence, and it would not be right to criticize any such decision, but it is unfortunate that the result is that there is a very generally prevalent view that offences under the Act, which are liable to result in accidents and endanger life by reason of the employment of tired drivers, are not serious offences against the law. In many cases the plea has been put forward that although drivers were employed for hours prohibited by law, the employer treated his drivers well, and that the nature of their employment was such that the excessive hours did not result in excessive fatigue. Such statements frequently have no better support than the bare statement of the advocate instructed by the accused. It would not generally be feasible for the prosecution to call evidence of employees as to their treatment, and it would in most cases be undesirable to do so. Parliament has decided what shall be the hours during which drivers can safely be employed on driving, having regard to average conditions; the question whether employment in excess of those hours did or did not in any particular case cause fatigue or danger, depends on so many different factors, including the physique of the driver, and changing day-to-day conditions, that it would not generally be useful to attempt to determine the question. I have hitherto used very sparingly my jurisdiction under Section 13 (1) of the Act to suspend or revoke licences, and during the current year only eight licences have been suspended for failure to observe conditions. The exercise of this jurisdiction is necessarily reserved for extreme cases, because the consequences are serious for the offender, and are also likely to cause inconvenience to industry generally. I have hoped that where warnings were not sufficient, the prosecution of offenders would prove an adequate deterrent, but where that is not so, suspension or revocation will be unavoidable.

13. The following table shows the result of proceedings instituted by me, where it was found to be necessary to prosecute:—

*Summonses.*

Offence.	Pending 30.9.37.	Withdrawn.	Dismissed.	P.O. Act.	Convicted.	Total.
Sec. 19, 1930 Act: Con- travention of limits of time for which drivers may be employed ...	102	160	99	182	497	1,040
Sec. 16, 1933 Act: Failing to keep or cause to be kept drivers' records...	48	242	3	122	322	737
Sec. 1, 1933 Act: Using a vehicle other than under a licence ...	—	—	—	3	9	12
Sec. 9 (1), 1933 Act: Failure to comply with conditions of licence ...	—	—	2	2	6	10
Other offences ...	5	—	—	3	17	25
	155	402*	104	312	851	1,824

\* This figure chiefly represents summonses withdrawn because convictions were obtained on alternative summonses.

I have continued to receive very valuable assistance from the Commissioner of Police of the Metropolis, who has recognised that the requirements of the Road and Rail Traffic Act, 1933, as to maintenance and licensing of goods vehicles, and as to the obligation of drivers of goods vehicles to carry records, are safety provisions. The Metropolitan Police and the Police throughout the Metropolitan Traffic Area have, in the course of their ordinary duties kept observation for breaches of the law in this respect, and the Vehicle Examiners and Traffic Examiners have worked in close liaison and co-operated with them wherever possible.



*Return of Certain Offences relating to Motor Goods Vehicles dealt with by the Metropolitan Police.*

Offence.	Cases reported.			Results of prosecutions.				
	Total.	Cautions.	Prosecutions.	Convicted.	Guilty, discharged under P.O.A.	Withdrawn or Dismissed.	Adjourned sine die.	
(1) Using a goods vehicle without a carrier's licence ... ..	1,036	106	930	711	170	43	6	
(2) Failing to keep records of work ... ..	2,985	2,147	838	661	142	32	3	
(3) Using a prohibited vehicle ... ..	16	6	10	5	4	1	—	
(4) Defective maintenance {	Brake offences ... ..	1,394	61	1,333	970	259	96	8
	Vehicle in such a condition as to cause danger ... ..	1,336	51	1,285	903	281	95	6
	Noise offences* ... ..	1,943	1,344	599	428	131	38	2
(5) Overloading ... ..	Defective tyres ... ..	2,323	1,516	807	632	110	60	5
	... ..	2	—	2	2	—	—	—
(6) Excessive speed ... ..	8,790	1,018	7,772	7,197	494	75	6	
(7) Excessive hours of drivers... ..	13	1	12	6	6	—	—	
(8) Miscellaneous... ..	No H.G.V. licence ... ..	172	153	19	15	4	—	—
	Employing driver without H.G.V. driver's licence ... ..	123	103	20	13	5	1	1
	Using or lending a carrier's licence, plate mark or other document ... ..	3	—	3	3	—	—	—
	Failing to produce carrier's licence, records of work or other document ... ..	88	87	1	1	—	—	—
	Breach of conditions of carrier's licence ... ..	6	2	4	4	—	—	—
	Other offences in connection with carriers' licences, identity certificates and records of work ... ..	672	597	75	54	17	3	1
	Other offences under Regulations made under the Road and Rail Traffic Act, 1933 ... ..	554	501	53	40	11	2	—
	Total ... ..	21,456	7,693	13,763	11,645	1,634	446	38

\* Includes offences under Regulations 69, 70, 71 and 73 of the Motor Vehicles (Construction and Use) Regulations, 1931, but excludes sounding of horn during prohibited hours. Separate figures for offences due to defect or lack of repair are not available.

The following table shows prosecutions undertaken by the Commissioner of Police for the Metropolis.

No record is compiled of police prosecutions in the Metropolitan Area outside the Metropolitan Police district, but the following is a record of convictions obtained and cautions issued by police authorities outside the Metropolitan Police district in respect of Metropolitan Traffic Area vehicles.

*Records of Convictions relating to Metropolitan vehicles notified by Police Authorities outside the Metropolitan Police District.*

	<i>Number of convictions.</i>
No carriers' licence ... ..	80
Using an unauthorised vehicle ... ..	41
Failing to keep drivers' records ... ..	520
Section 19, 1930 Act ... ..	35
Overloading ... ..	120
Defective maintenance ... ..	487
Using a prohibited vehicle ... ..	3
Excessive speed ... ..	2,286
Other offences ... ..	598
<b>Total ... ..</b>	<b>4,170</b>

*Use of "C" Licence Vehicles for Carriage of Rubbish.*

14. At the date of the termination of the period of this Report an appeal from a decision of Magistrates in regard to the carriage of rubbish for hire or reward on vehicles authorised by "C" licences was pending in the case of Spittle v. Thames Grit & Aggregates, Limited. Although the decision of the High Court on appeal was not given until 20th October, 1937, I am able to deal with it in this Report. The appeal did not raise any difficult question of interpretation of the Act, as the wording of the Act was reasonably clear, but a number of holders of "C" licences had been accustomed to carry rubbish on vehicles authorised in those licences, and they contended that although they received payment or remuneration for carrying the rubbish, the work should not be deemed to be done for hire or reward. This contention was based alternatively on two grounds, firstly that the rubbish was of no value, and that the carriers were not under any obligation to deliver it to any particular destination, but could dispose of it as they wished, and secondly that the carriage and disposal of the rubbish should be regarded as an operation in the course of a business carried on by them. The High Court held that the rubbish was carried for hire or reward; that it was immaterial whether the property in the rubbish carried was or was not vested in the carriers when loaded on to the vehicles; that the operation did not come within Section 1 (5) (a) or (b) of the Road and Rail Traffic Act, 1933, as the rubbish was not sold, used, etc., in the course of a business carried on by the accused, and that a person receiving payment for carriage of goods, must be held to carry the same for hire or reward within the meaning of the Act, unless he can show that the carriage comes within the provisions of Section 1 (5) of the Act.

*Operation and Application of the Act.*

15. During the year there has been continually increasing evidence of the elasticity of the licensing procedure of the Act to meet the needs of industry. A large number of additional vehicles have been authorised to meet the growing needs of operators who have increased their businesses. The additional vehicles so authorised do not, however, constitute the measure of the increased tonnage which has been brought into use. It will be remembered that applicants for "A" licences were not only entitled to "claimed tonnage" equivalent to the vehicles owned and used by them in the basic year, but that in practice applicants for licences were generally given grants for vehicles in possession although in excess of their "claimed tonnage." Included in this "claimed tonnage" and in the vehicles in possession were large numbers of vehicles and many hundreds of tons of transport which were not being used when the Act came into force. Many operators have, during the currency of their licences, availed themselves of this reserve of transport, and brought vehicles into use as their trade has improved. Increased business does not, however, always flow into the channels

where vehicles are available, its flow is directed and influenced by many factors including, no doubt, efficiency, business acumen and ability, but there are many other factors. Success does not necessarily go to the worthy or the strong, but for various reasons some haulage businesses increase, and require increased numbers of vehicles, while others decrease, and are unable to employ all the vehicles which they are authorised to use. It is interesting to observe, and very important from the standpoint of the haulage industry and trade generally, that this natural process has not been prevented by the licensing system. This is demonstrated by the large increases of tonnage which have been obtained on proof of need by progressive operators during the whole period since the Act came into force, while during the same period so much tonnage held by other licence holders has been unemployed. Exact figures of this unemployed tonnage are not available, but the publications of "Applications and Decisions" show many vehicles voluntarily "surrendered" on application for renewal, without any additional vehicles in substitution. In addition to these, many vehicles representing the balance of claimed tonnage not taken up prior to renewal would not appear as "surrendered," but would not be applied for on renewal. Added to these were the large numbers of vehicles specified in licences and formally applied for on renewal, but which were shown by inspection of road fund licence books not to have been used for long periods, and in many cases throughout the period of the licence. In the application of the goods licensing procedure there can never be accurate adjustment of facilities to needs, and surplus facilities will always exist at the disposal of some operators, while need will arise for other operators to acquire more vehicles. Undue difficulty in getting the additional transport for expanding haulage businesses would have had the result of forcing into use the unused reserve. This would have been undesirable, if inefficiency had been the sole or even the chief cause of non-user. There are, however, undoubtedly many other causes, and there is no reason to infer that the restraint or control to a certain extent of the introduction of new facilities, which reduces the waste and loss caused by non-user of existing facilities, is other than beneficial both for trade generally and for the road transport industry itself. A false impression is liable to be created by a hasty comparison of certain figures relating to the number of vehicles authorised on "C" licences and "A" licences respectively, which when unexplained might appear to suggest that the licensing control has resulted in a transfer of traffic to "C" licence vehicles. The number of motor vehicles in possession which appear from available records to be authorised throughout the country by "C" licences has risen as at 30th June, 1937 to 362,380 from the number authorised as at 30th April, 1936, which was 316,714. This shows an apparent rise of 45,666 or 14 per cent., whereas in the same period motor vehicles in possession authorised by "A" licences only increased from 90,493 to 91,101; an increase of 608 or 0.6 per cent. These figures cannot, however, be relied on to support any comparison of the increase in the number of vehicles used under different classes of licence, and the figures convey an altogether false impression in that respect. Records of road fund licences current during the quarters ending 30th September, 1936, and 1937, show that the total goods motor vehicles of all classes including tractors taxed in these quarters respectively were 462,016 in 1936 and 481,789 in 1937, an increase of only 19,773, whereas motor vehicles in possession authorised by all carriers licences increased from 460,016 in April, 1936, to 507,256 in June, 1937, the nearest corresponding periods for which figures are available; this was an apparent increase of 47,240. To compare these figures would falsely suggest that goods motor vehicles in use as shown by carriers licences had increased by very much more than the total increase of goods motor vehicles on the road and taxed, which would of course, be impossible. The explanation of the apparent contradiction is that the figures available do not and cannot provide any comparison between the motor vehicles authorised by "C" licences and by "A" licences at different periods. In the first place, as already explained, the figures of motor vehicles authorised by "A" licences as at 30th April, 1936, were swollen by vehicles unused and untaxed, and vehicles already scrapped but retained on the "A" licences in order to obtain the benefit of substitution rights. By 30th June, 1937, the renewal of "A" licences had nearly been completed, and the figures at 30th June, 1937, showed approximately the actual number of motor vehicles in use under "A" licences. The fact that such number was slightly in excess of the swollen tonnage of 30th June, 1936, shows a considerable

increase of vehicles actually used under "A" licences. It is also a matter of interest that the average weight of vehicles authorised by "A" licences has increased since the date of my first Report from 2 tons 9 cwts. to 2 tons 11 cwts.

A careful analysis of the "C" licence figures provides a further and much fuller explanation of the false comparison. As I explained in my last Report the Regulations were amended on 26th March, 1936, to make the display of identity certificates compulsory as from 1st October, 1936, for "C" licence vehicles. My last Report showed that in consequence of the new regulation many more users of vehicles became aware of the licensing requirements, or were induced to apply for licences. It was also thereby disclosed that several thousand sales of vehicles specified in "C" licences, and many changes in the constitution of licence holding firms had been effected without proper notification to the Licensing Authorities. These notifications were effected after 30th April, 1936, and greatly increased the numbers of vehicles specified in "C" licences. During the three months following the introduction of "C" identity certificates on the 1st October, 1936, the consequent correction of "C" licences, and the increased number of new licence applications resulted in an approximate increase of 2,000 in the normal specification of "C" licence vehicles in the Metropolitan Area alone. From that time the normal number of new specifications of vehicles has continued, but the actual increase of vehicles in use is very much smaller. For instance the "wastage" caused by shopkeepers and other traders going out of business is very great, and their place is taken by new traders starting new businesses. The extent of this wastage is shown by the fact that in the case of "C" licences, a large proportion of which fell due for renewal on 1st July, 1937, applications for continuation licences had at 30th September, 1937, been received from approximately only 75 per cent. of the old licence holders. In about half the cases where "C" licence holders had gone out of business they had surrendered the licences, but the remainder had not been surrendered prior to the date of expiration. The records show that in the Metropolitan Area alone the motor vehicles specified in "C" licences at 30th September, 1937, were, in consequence of the adjustment effected by renewals, about 3,000 less than as at 30th June, 1937. The figures of the number of "C" licence vehicles authorised as at 30th April, 1936, were therefore less than the number of vehicles actually in use, and on the other hand the figures as at 30th June, 1937, just before the renewal date of 1st July, 1937, unavoidably include large numbers of vehicles which at that date were no longer in the possession of the licence holders.

I desire to acknowledge the help which I have received from the Police Authorities in the Area, and the assistance and co-operation of the Trade Associations and of the Transport industry. I also desire to record my great appreciation of the work done by the Clerk and the Staff of the Area.

I have the honour to be, Sir,

Your obedient Servant,

GLEESON E. ROBINSON,  
Licensing Authority.

## NORTHERN TRAFFIC AREA, SCOTLAND

To the Minister of Transport.

SIR,

I have the honour to present my third Report as Licensing Authority for the Northern Traffic Area, Scotland, in accordance with Sub-section (4) of Section 23 of the Road and Rail Traffic Act, 1933.

The Report covers the period from 1st October, 1936, to 30th September, 1937.

### *Public Inquiries.*

1. Public Inquiries were held on 117 days at 22 centres as follows:—

	<i>Number of Inquiries.</i>	<i>Days Occupied.</i>
Aberdeen ... ..	26	47
Alloa ... ..	1	1
Banff ... ..	1	1
Cupar ... ..	2	2
Dingwall ... ..	3	3
Dornoch ... ..	1	1
Dundee ... ..	12	19
Dunfermline ... ..	4	6
Elgin ... ..	3	3
Forfar ... ..	1	1
Fort William ... ..	1	1
Inverness ... ..	6	6
Kirkcaldy ... ..	3	3
Kirkwall ... ..	1	2
Kyle ... ..	1	1
Lerwick ... ..	1	2
Lochmaddy ... ..	1	1
Mallaig ... ..	1	1
Perth ... ..	9	10
Portree ... ..	1	1
Stornoway ... ..	1	2
Wick ... ..	2	3

---

82    on 117 days.

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The large proportion of time allotted to Aberdeen was due to the extensive volume of detailed evidence submitted at the hearing of a group of applications relating to the long-distance haulage of fish. Special reference is made to these applications in paragraph 9.

The geographical handicap of this Area may be realised from the fact that, in order to hold the above Public Inquiries, it was necessary for me to travel over 7,000 miles, *viz.*, 6,400 by rail and 650 by sea.

## Statistics.

2.

(a) TABLE I.—Applications for Carriers' Licences.

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ... ..	133	574	28	582	19
Short Term, Section 3 (3) ...	1	39	8	32	—
Contract ... ..	6	33	—	37	1
"B" Licences :—					
Currency Period ... ..	211	1,628	50	1,450	39
Short Term, Section 3 (3) ...	2	219	13	204	4
"C" Licences :—					
Currency Period ... ..	—	3,426	27	3,366	—
Short Term, Section 3 (3) ...	—	53	2	51	—

	A.	B.	C.
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..	—	—	4
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	6	3	—
Short Term Administrative Licences issued (Section 3 (4)). ...	70	60	—
Short Term Licences authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations) ... ..	52	28	—

(b) TABLE II.—Applications for Variation of Carriers' Licences.

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to Vehicles					
"A" Licences :—					
Published and dealt with at Inquiry ... ..	31	444	11	59	10
Published but determined without Inquiry ... ..			1	19	—
Not published ... ..			1	349	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	39	507	12	83	10
Published but determined without Inquiry ... ..			4	37	—
Not published ... ..			—	368	—
Variations of Conditions attached to "B" Licences...	13	41	6	43	5

(c) Applications under Section 2 (4).

Applications received ... ..	1
Applications granted ... ..	1

(This was for the carriage of small groceries on New Year's Eve, no other vehicle being available in locality.)

*(d) Revocations and Suspensions.*

Carriers' Licences revoked	...	...	...	...	...	Nil.
Licences suspended	...	...	...	...	...	Nil.
Vehicles removed from Licence under provisions of Section 13 (3)	...	...	...	...	...	2 vehicles removed from one licence.

3. *Objections.*

## 1. "A" Applications—

	<i>Lodged.</i>	<i>Pursued.</i>
New	25	22
Continuations	61	47
Section 11 (3) (b)*	6	6
Variations	48	45
Claimed Contract	—	—
Section 3 (3)	1	—
	<hr/> 141	<hr/> 120

## 2. "B" Applications—

New	106	97
Continuations	153	149
Section 11 (3) (b)*	6	6
Variations (vehicles)	34	32
Variations (conditions)	21	20
Section 3 (3)	5	4
	<hr/> 325	<hr/> 308

*Appeals to the Appeal Tribunal under Section 15 of Road and Rail Traffic Act, 1933.*

## 4. There were 15 Appeals to be dealt with:—

Decisions pending from last year	...	...	...	...	3
Lodged with Appeal Tribunal during the year	...	...	...	...	12

## Of the 12 appeals lodged during the year—

(a) five appeals were lodged in respect of the grant of two applications for "A" licences, *viz.*, four appeals by objectors against the grant of the two applications and one appeal by the applicant in one of the cases because the number of vehicles granted was less than the number for which application had been made, and

(b) seven appeals were lodged by the same applicant against the refusal to grant his applications for seven "A" licences, respectively; each of the seven applications was for a licence in continuation of a licence which had been granted under conditions to which Section 11 (3) (b) applied.

## Decision was given in five cases as follows:—

Allowed	...	...	...	...	...	2
Dismissed	...	...	...	...	...	3

The two appeals which were allowed were two of the four appeals against my decision granting an "A" licence in continuation of an existing "A" licence. I have made special reference thereto in paragraph 9 *infra*.

The three appeals which were dismissed were those carried over from the previous year. The ground of the appeals was that at the hearing of the applications I had wrongly held as incompetent certain objections to the applications which the appellants had lodged.

There are thus ten appeals to be heard and decided.

\* Applications for licences to expire not later than the expiry dates of licences held by Carriers whose businesses the applicants intended respectively to acquire; the applications were made under Section 5, the provisions of Section 11 (3) (b) were invoked and licences were granted under Section 6.

5. *Maintenance of Vehicles.*

(a) Number of inspections carried out ... ..	5,185
Approximate number of vehicles covered thereby ...	3,350
(b) Number of prohibition notices issued ... ..	624
Comprising:—	
Immediate prohibitions ... ..	248
Delayed prohibitions ... ..	376
(c) Defects in the parts shown below were mainly responsible for the issue of these prohibition notices:—	
Steering arms and ballpins ... ..	78
Steering stops ... ..	46
Steering column box and drop arm ... ..	227
Steering links (track rod and drag link) ... ..	234
Front swivel axles, bushes and pins ... ..	290
Front axle beam ... ..	4
Springs, anchors for springs and front radius rod ... ..	265
Shackles, pins and bushes ... ..	266
Foot brakes and mechanism ... ..	265
Hand brakes and mechanism ... ..	328
Road wheels, studs, etc. ... ..	276
Frames, cross members, sub-frames, and brackets ... ..	120
Rear axle and differential gear and case ... ..	30
Engine, gearbox and clutch, propeller shafts, joints and bearings ... ..	144
Exhaust system ... ..	115
Petrol system ... ..	43
Mud wings and bodywork ... ..	355
Motor circulation ... ..	25
Other parts ... ..	174
(d) There were no appeals to the Certifying Officer or to the Minister against refusal to remove a prohibition.	

Generally speaking, it has been found in the more populous parts of the Area that there has been a decrease in the number of instances in which the brakes and steering gear in goods vehicles have been found to be defective.

There is a tendency for major operators to dispense with the heavier types of vehicles and to substitute vehicles of a weight which permits a speed of 30 miles an hour; this is supported by the Registration statistics. The result is a consequential tendency to overloading, and many of the vehicles concerned have been found to suffer from defects due thereto. Instances of overloading can be observed frequently on the road, but the characteristic defects are particularly noticeable when the vehicles are mechanically inspected; for example, the main chassis members, spring brackets and rear axle casings are regularly found to have been bent or displaced through overloading.

The lighter type of vehicle used as a cattle float is constructed so that two or three decks can be fitted as required for the purpose of carrying sheep, and the result is interference with the stability of the vehicle. Instances have occurred where such vehicles have overturned owing to skidding or to the wheels having slipped into ditches on narrow roads. It is obvious that the attachment of a high-sided body to a chassis of almost the same weight will result in instability especially when loads such as three tiers of sheep are carried. The same trouble is experienced with trailers fitted with cattle floats and used for the conveyance of cattle and sheep; some of these trailers also are constructed so that two or three decks can be fitted for the purpose of carrying sheep. The difficulty is increased in the case of the trailer because the weight of the float body is not counter-balanced, for example, by the weight of an engine and transmission gear.

There is an increase in the use of trailers drawn by private motor cars, mainly in the agricultural districts and in the vicinity of cattle marts. Many of these trailers are not particularly well suited for their present use.

In general, the standard of maintenance has improved, but in rural areas it still leaves much to be desired.



## Section 16 (3)—Dispensations.

6. Seventeen dispensations from the observance of certain requirements of the Goods Vehicles (Keeping of Records) Regulations, 1935, were in force during the period under review. The dispensations, varying in degree, were for the most part regrants on the expiry of previous currency, and were as follows:—

## "A" Licence holders.

Carrier on small island of Bressay, Shetland ... ..	1
Mail Steamship Company ... ..	1

## "B" Licence holders.

Hide and Skin Merchants ... ..	1
--------------------------------	---

## "C" Licence holders.

Electricity Undertakings ... ..	4
Estate Owners ... ..	4
Local Authorities (for special reasons) ... ..	3
Mental Asylum ... ..	1
Business of repairing agricultural machinery ... ..	1
Business of destruction and removal of animals ... ..	1

—  
17  
—

## 7. ENFORCEMENT.—Particulars of Offences in connection with Goods Vehicles.

Offences.  (1)	Proceedings in which L.A. has participated.				Other proceedings.
	No of. offences. (2)	Con- victions. (3)	Acquitted or dis- missed. (4)	Pending. (5)	Con- victions notified by Police. (6)
<i>Road Traffic Act, 1930.</i> <i>Sec. 10—</i> and/or <i>Road Traffic Act, 1934,</i> <i>Sec. 1.</i> Exceeding speed limit ...	2	2	—	—	405
<i>Sec. 11.</i> Reckless or dangerous driving ...	1	1	—	—	8
<i>Sec. 12.</i> Careless driving ... ..	5	2	—	3	94
<i>Sec. 19.</i> Failing to observe limitations of time for which drivers of certain vehicles may remain continuously on duty*	24	14	—	10	19
<i>Sec. 112 and Road and Rail Traffic Act,</i> <i>1933—Sec. 34.</i> Forgery, &c., of Licences and Certificates	2	—	1	1	5
<i>Road and Rail Traffic Act, 1933.</i> <i>Sec. 1.</i> Using goods vehicle on a road for car- riage of goods without Carrier's Licence ... ..	34	11	1	22	16
<i>Secs. 2, 8 and 9.</i> Breach of conditions of Carriers' Licences	46	12	1	33	8
<i>Secs. 16 and 25, and/or Goods Vehicles</i> <i>(Keeping of Records) Regulations,</i> <i>1935.</i> Failing to comply with requirements on keeping of drivers' records ...	97	49	5	43	98

Offences.  (1)	Proceedings in which L.A. has participated.				Other proceedings.
	No. of Offences.  (2)	Con- victions.  (3)	Acquitted or dis- missed.  (4)	Pending.  (5)	Con- victions notified by Police.  (6)
<i>Sec. 17.</i> Using vehicle whilst prohibition operative ... ..	5	1	—	4	12
<i>Road Traffic Act, 1934.</i> <i>Sec. 31.</i> Driving heavy goods vehicle without holding licence for that purpose ...	3	3	—	—	6
<i>Motor Vehicles (Construction and Use) Regulations, 1937 and/or 1931.</i> Failing to have vehicle equipped with mirror ... ..	—	—	—	—	19
Failing to have windscreen fitted with safety glass ... ..	1	—	—	1	2
Failing to carry and/or to use warning instrument ... ..	—	—	—	—	4
Failing to have silencer fitted ... ..	7	—	—	7	9
Failing to have prescribed tyres fitted to vehicle and to maintain them in prescribed condition ... ..	6	2	—	4	13
Failing to have unladen weight plainly marked on vehicle ... ..	1	1	—	—	5
Failing to have vehicle equipped with prescribed braking system and/or to maintain brakes in good and efficient working order ... ..	113	66	2	45	29
Failing to observe limits or distribution of load and/or failing to maintain vehicle in fit and serviceable condition ...	17	13	—	4	54
<i>Goods Vehicles (Licences and Prohibitions) Regulations, 1936.</i> Failing to have Identity Certificate affixed ... ..	8	1	—	7	11
<i>Road Finance Act, 1920—Sec. 14.</i> Carrying excessive weight ... ..	3	1	—	2	13
Offences against other statutory provisions	—	—	—	—	168
Totals ... ..	375	179	10	186	998

Col. 2 = Total of cols. 3, 4 and 5.

\* In addition to offences shown under Sec. 19 R.T.A., 1930, there were approximately 120 cases in which letters of warning were sent to the licence-holders concerned.

The duties of Traffic Examiners have taken them far afield and in many cases beyond the Area's boundaries—where they have worked in conjunction with officers of other Areas and the Constabulary.

A great deal of time has been devoted to the enforcement of statutory provisions regarding the keeping of drivers' records. The examination of records is the starting point in investigation of a variety of suspected irregularities beyond the contravention of Section 16 of the Road and Rail Traffic Act, 1933, and the failure properly to keep records as required by the Regulations.

The devices employed in order to evade the detection of irregularities are, especially as regards driving for excessive periods, numerous and ingenious.

Examiners have provided me with useful information on many subjects, and in particular the observance of the conditions attached to Carriers' Licences, both general and special.

I regret to record my impression that, on the part of a certain type of operator, there is widespread disregard of statutory obligation and requirement. On the other hand, the majority of licence-holders, I feel convinced, neither wish nor intend to infringe the Law and in dealing with offences of a minor character my usual method is to warn by letter the driver or licence-holder, or both, concerned; in the majority of such cases the warnings have proved effective. During the whole year there was only one case in which my warning letter was disregarded.

8. *Licences to Drive Heavy Goods Vehicle.*

Applications carried over from previous year ... ..	38
Applications received ... ..	1,833
	<hr/>
	1,871
	<hr/>
Provisional licences granted ... ..	426
	<hr/>
Substantive licences granted ... ..	1,581
Substantive licences refused ... ..	12
Provisional licences refused ... ..	8
Withdrawn on failure to arrange driving test ... ..	101
Applications withdrawn ... ..	52
Applications outstanding at 30th September, 1937 ... ..	117
	<hr/>
	1,871
	<hr/>

*Provisional Licences.*

The issue of provisional licences under the Road Traffic (Driving Licences) Act, 1936, has facilitated the testing of applicants for licences to drive heavy goods vehicles.

*Refusals.*

The 20 applications refused were accounted for as follows:—

Failure to pass driving test ... ..	6
The nature or number of convictions recorded against them	12
Under age ... ..	1
Medical reasons ... ..	1
	<hr/>
	20
	<hr/>

*Withdrawals.*

As in the previous year, applications were withdrawn, owing in most cases to the applicants' inability to provide vehicles for test.

*Outstanding.*

The majority of the 117 applicants whose applications are shown as outstanding at 30th September, 1937, were awaiting a driving test, respective provisional licences having been issued.

*Revocations.*

I revoked two licences during the year—one because the holder was convicted of an offence for speeding when his ordinary driving licence was suspended for one year and endorsed; the other because the holder was convicted of driving when under the influence of drink, and was disqualified from holding an ordinary driving licence for 12 months.

*Suspensions.*

I suspended eight licences for varying periods from one month to six months on account of convictions recorded against the holders.

*Convictions.*

I received from various Chief Constables notifications of 339 convictions against 256 drivers of heavy goods vehicles. Approximately one-half of the convictions were for speeding. I interviewed 129 of these drivers, and in practically all cases the interviews were arranged to take place during the

adjournment intervals at Public Sitings and Inquiries. The following summarises the convictions recorded against those 129 drivers during the year under review:—

Section 10 of the Road Traffic Act, 1930 (Speeding) ...	99
Section 12 of the Road Traffic Act, 1930 (Careless Driving)	15
Section 15 of the Road Traffic Act, 1930 (Driving under influence of drink) ... ..	1
Other offences ... ..	35
	<hr/>
	150
	<hr/>

Of these 129 drivers—

- 20 were applicants for new licences to drive heavy goods vehicles.
- 23 were applicants for licences in continuation of existing licences to drive heavy goods vehicles.
- 86 were holders of licences to drive heavy goods vehicles which were not near the point of expiry.

As a result of my interviews—

- 7 applications for new licences were refused.
- 4 applications for licences in continuation were refused.
- 2 licences were revoked (see above).
- 8 licences were suspended (see above).
- 106 Licence holders and applicants were severely warned and reminded of the powers of the Licensing Authority to suspend and to revoke Licences.
- 1 application for a first Licence was postponed for consideration at a later date.
- 1 application for a Licence in continuation of an existing Licence was postponed for later consideration. An Appeal was lodged against my decision with the Sheriff but he upheld my decision.

In addition to the foregoing I warned by letter approximately one-third of the (256) convicted persons concerned.

#### *Driving Tests.*

The number of driving tests carried out by my Examiners was 295. In addition, 23 tests were carried out by other authorised persons. The figures relating to tests by Examiners are as follows:—

(a) number of tests in which applicants passed first time	287
(b) number of tests in which applicant passed after the first test ... ..	2
(c) number of tests as a result of which applications were refused ... ..	6
	<hr/>
	295
	<hr/>

#### *Transport of Fish.*

9. In my previous Reports I have referred to the marked attention directed in this Area to the long-distance haulage of fish, that is, from Ullapool, the North-west Coast of Scotland, and from Aberdeen, Peterhead, Lossiemouth and other north-east ports to many centres in England, including London, Birmingham, Manchester and Liverpool. Questions arising on this traffic again formed an important part of the year's work and were fully debated at the hearing of a group of applications for "A" Licences "in continuation"; the group consisted of an application for an "A" Licence in continuation of the Carrier's original "A" Licence and several other applications made by him for "A" Licences in continuation respectively of Licences which had been granted to him under Section 6 (2) and to which I had applied Section 11 (3) (b) of the Act of 1933. The hearing occupied twenty-one days at Public Inquiries, when witnesses were called by both applicant and objectors from all parts of Great Britain. The mere bulk of the documentary record of this case is without precedent in this—or probably any—Area. Appeals have been lodged against my decision to grant one application in part and to refuse the other applications, the grounds being that, on the one hand, I granted too little and on the other hand, too much.

A minor case concerning haulage of fish from this Area came before the Appeal Tribunal, who allowed the Appeal, the case being fully reported in *Traffic Cases*, Vol. 25, page 272, London, Midland & Scottish Railway Company and London & North Eastern Railway Company, Appellants, and Stuart, Respondent. The administrative repercussions of this decision are considerable and the aspect of continuity is now emphasized.

#### *Needs of Agriculture.*

10. The carriage of livestock continued to be the subject of application for additional facilities and also of strong opposition by the Railway Companies. I was much impressed by the evidence given in support of one such application by a Perthshire farmer whom I might describe as a typical "canny Scot". He explained that in his neighbourhood farmers nowadays were strongly influenced in the marketing of their stock by the wireless reports of stock prices, and their consignments to the most advantageous market were very frequently of the "last-minute" type, for which only motor transport was suitable.

I received a number of enquiries regarding the legality of carrying potato-workers to or from their work in commercial vehicles. Apprehension appears to have been caused through the circulation of an incomplete report of my remarks at a Public Inquiry which conveyed the impression that potato-gatherers could not lawfully be carried on a commercial vehicle. The fact is that I was requested at the Inquiry on behalf of an applicant for a "B" Licence, to attach thereto a special condition to authorise him to carry potato-gatherers in his authorised vehicles for hire or reward. I had no option but to refuse to attach such a condition and I pointed out that, wherever a charge should be made directly or indirectly for such transport, an offence would be committed against the provisions of the Road Traffic Act 1930.

#### *Variation of Licences.*

11. Applications for variation of "A" and "B" Licences published and heard at Public Inquiries, although smaller numerically than currency applications, have formed an important part of my work. In many cases, variations which sought additional vehicles or extended radius were opposed by the Railway Companies with the same thoroughness and detailed submission and analysis of evidence as is expected in connection with new full-term applications. The Railway Companies' representatives have come to my Inquiries thoroughly informed by their staffs, not only as regards statistics, but also as regards what was said and what transpired at previous Inquiries.

I have occasionally been reminded by applicants who delayed making application until the last moment that they were in a hurry. Every effort has been made to prevent hardship in cases where difficulties were genuinely unforeseen, but some licence-holders in making belated requests showed little consideration for or understanding of the administrative machine. There was, for example, no foundation for the complaint by a poetic Hebridean that, owing to my "department's languid decision such transaction between myself and client has been obliterated".

#### *Private Carriers' Licences.*

12. Agents for the sale and distribution of commercial vehicles who provide demonstrations with the kind of load dealt with by the prospective purchaser must exercise some care in order to avoid the contravention of Section 1 (1) (a) of the Act. The holder of a Private Carrier's Licence in this Area was convicted under this Section and admonished because it was held that a "further demonstration", in the course of which goods were delivered by his demonstration vehicle, was not *in fact* a demonstration. The customer whose goods were delivered had been given previous demonstrations and had placed an order for a vehicle previous to the occasion in regard to which the agent was charged.

The use of the private car with or without trailer for purposes previously fulfilled by a small commercial vehicle continues to increase. In my second Report, I referred to the appearance of this form of haulage among small business owners and agriculturists. During the past year the disposal of applications for continuation of Private Carriers' Licences has disclosed a steady drift of tradesmen (slaters, painters, joiners) to private car haulage. I observe that the manufacturers of motor vehicles are aware of the new development and now provide half-a-dozen types of private car trailer for commercial purposes.

*Wages and Conditions of Service.*

13. The adjustment of wages and conditions of service more especially in the sparsely populated districts of this Area has given me great concern. Unofficial committees of employers and employees were in fact set up, came to grips with the difficulties and reached conclusions, in each case on a regional basis, which were, on the whole, acceptable to employees generally. These conclusions were submitted to the Scottish Conciliation Board for the Road Transport Industry (Goods) as applications for the variation of the standard wages and conditions, operative from 1st July, 1935, set out in the Board's Decisions. The Scottish Conciliation Board's resolution "that there should be no alteration or variation or any lesser scale of wages applied in any part of Scotland" was contained in the print of their Decisions, dated March, 1936. In their Statement supporting and explaining the resolution the Board deprecated the extent to which transport was furnished in these districts by "B" Licence-holders, suggesting that conditions would be improved if "*bona fide* contractors" did the work; I presume that by the term "*bona fide* Contractors" the Board meant Carriers holding "A" Licences. The Board decided to postpone any favourable consideration of the applications until in their own words "the multiplication of transport facilities which are surplus to other businesses is brought to a reasonable level".

Under the hard conditions of life in these portions of my Area, so essentially different from the conditions in urban districts or even in many country districts in other Areas, it is inevitable that many lorry-owners should engage in agriculture, fishing or other work, in order to secure a livelihood, and consequently they fall into the "B" category. I do not feel that the intention of Parliament was to discourage the activities of sturdy islanders who are doing much to improve their conditions of life by introducing motor transport and demanding better roads.

*Co-operation with Constabulary.*

14. My Examiners have again received the assistance and co-operation of all the Chief Constables and their staffs and this valuable support has, without exception been readily accorded. I am particularly grateful to the Chief Constables because I know only too well that the work of my Examiners and Enforcement Staff would have been of considerably less value without this co-operation. Whatever has been achieved by way of improvement in the observance of statutory provisions in the operation of goods carrying vehicles is attributable to unity of action and understanding.

In a large number of cases the Police have detected offences in the first instance and my Staff have furnished the necessary support in subsequent proceedings by providing, at their request, statements of fact and attending at Court as witnesses.

*Press.*

15. I wish to acknowledge my debt to the Press for fair and accurate reporting of my Public Inquiries and for reasoned and constructive editorial comment. All interested in the business of haulage have been greatly assisted by the publication in both the daily press and Trade press of the grounds of grant or refusal of Licences and of new developments in industry and other important associated information, cited in evidence at the hearing of applications.

*Staff.*

16. I am grateful to my Staff for their support by another year of hard work and co-operation; I was glad to hear from hauliers and their agents that they appreciated the willing effort of my Staff to smooth away difficulties.

I have the honour to be,

Sir,

Your obedient Servant,

HENRY RICHES,

Licensing Authority.

## SOUTHERN SCOTLAND TRAFFIC AREA

To the Minister of Transport.

SIR,

1. I have the honour to submit my third annual report as Licensing Authority for the Southern Scotland Traffic Area in accordance with the provisions of Section 23 (4) of the Road and Rail Traffic Act, 1933, for the twelve months ended 30th September, 1937.

2. The third year has passed without any event of any great importance in this Area.

### *Procedure at Public Inquiries.*

3. The presentation of applications at Public Inquiries involves more legal assistance than in previous years and I estimate that 80 per cent. of the applicants who appear before me are legally represented. It sometimes happens that an applicant only decides to secure legal aid whilst sitting in Court waiting for his case to be called and solicitors are called upon to act then and there. These somewhat belated decisions often lead to the cases being adjourned, thereby entailing a second attendance of the parties involved.

4. Progress at inquiries if reckoned on the number of cases dealt with and compared with previous years is somewhat slowed down. The parties concerned are now bringing more witnesses. Evidence is more detailed and given at greater length and as the objectors are pressing their objections with increasing vigour so do the applicants prepare with greater care to resist the attack.

5. It becomes very difficult to determine the number of cases to be listed for a day's hearing. No definite estimate can be made of the time that will be taken up by each case until the inquiry begins; while this involves some of the parties called to a hearing in loss of time, I have not yet found any means by which this can be avoided.

6. On the other hand the flow of applications, particularly for additional vehicles, is somewhat reduced. I attribute this to the knowledge carriers now have of the need to prove their case.

7. During the past year, I have continued to issue "Applications and Decisions" fortnightly.

### *Public Inquiries.*

8. Public Inquiries were held on 96 days for the purpose of hearing applications for "A" and "B" licences and variations of such licences. They took place at the following towns, Brodick (1); Dunoon (1); Dumfries (2); Edinburgh (41); Glasgow (50); Oban (1).

### *Objections.*

9. Applications for additional vehicles were very keenly contested by the Railway Companies and more particularly so in the case of "A" licences.

10. While objections were often lodged by the Railway Companies to applications for the regrant of "B" licences that were without modification, such objections were rarely against the issue of the licence, but were in general more directed to secure a further limitation of the articles carried or of the radius of operation. It frequently transpired that the objectors intentions were determined owing to information they possessed as to the actual work being done.

11. The tables which follow (Table I and Table II) show the number of applications of the various kinds which have been received during the year and the manner of their disposal:—

Table I.—Applications for Carrier's Licences.

Nature of Application.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
"A" Licences :—					
Currency Period ... ..	133	1,263	33	1,324	34
Short Term, Section 3 (3) ...	2	5	1	6	—
Contract ... ..	—	153	—	153	—
"B" Licences :—					
Currency Period ... ..	365	1,886	65	1,869	77
Short Term, Section 3 (3) ...	—	5	—	5	—
"C" Licences :—					
Currency Period ... ..	—	7,301	—	7,301	—
Short Term, Section 3 (3) ...	—	60	—	60	—

	"A"	"B"	"C"
Applications (included above) in respect of which a holding company signified its desire that the provisions of Section 12 of the Act should apply and which were so dealt with ... ..	1	—	—
Applications (included above) to which the provisions of paragraph (b) of Section 11 (3) of the Act applied and which were dealt with without publication ... ..	—	—	—
Short Term Administrative Licences issued (Section 3 (4)) ...	9	25	—
Short Term Licences issued authorising the use of vehicles in temporary replacement of authorised vehicles (Section 3 (2) and Regulation 15 of the Licences and Prohibitions Regulations)	—	—	—

Table II.—Applications for variation of Carrier's Licences.

Nature of Variation.	Applications outstanding from previous year.	Applications received during the year.	Applications disposed of during the year.		
			Withdrawn.	Granted.	Refused.
Variations relating to vehicles					
"A" Licences :—					
Published and dealt with at Inquiry ... ..	21	1,136	26	133	21
Published but determined without Inquiry ... ..			—	28	—
Not published ... ..			—	909	—
"B" Licences :—					
Published and dealt with at Inquiry ... ..	9	768	17	46	36
Published but determined without Inquiry ... ..			—	31	—
Not published ... ..			—	627	—
Variations of Conditions attached to "B" Licences...	1	64	5	37	16

12. The following table shows the number of objections received and the category of licence affected:—

Source of objection.	Total.	Percentage of total.
London and North Eastern Railway ... ..	528	36.85
London Midland and Scottish Railway ... ..	723	50.45
Other Road Operators ... ..	182	12.70
	<u>1,433</u>	<u>100.00</u>



	<i>Category of Licence.</i>	<i>No. of objections.</i>	<i>No. of notifiable applications.</i>
" A " ... ..	...	461	1,396
" B " ... ..	...	507	2,251
" A " variation	...	284	248
" B " variation	...	181	215

#### *Contract Licences.*

13. There has been a striking increase in the number of vehicles authorised under Contract Licences compared with last year. The figure has in fact been practically doubled. A good deal of this increase can be attributed to the continuance of the boom in the building trade and the large number of contracts which have been negotiated between carriers and brick makers.

14. In my report last year I referred to the reluctance of local authorities to enter into definite contracts with carriers and to the number of instances in which I had had to authorise additional vehicles under ordinary " A " licences where the sole need was that of work for local authorities. Recently some of these authorities have modified their practice and contracts are now signed which enables me to cover this work by the grant of contract licences.

15. Although some contracts have been presented to me with applications on which I granted licences, which were terminated before the expiry of a year, my experience now is that in the great majority of cases they are not only observed by both parties during the period of the agreement, but are renewed on expiry. In my opinion this indicates that in practice the grant of contract licences under the safeguards which the Act requires fulfils a function which is useful to carriers and traders alike.

16. My enforcement staff have instructions to keep the vehicles authorised by contract licences under close observation and one or two contraventions have been detected and punished. It may be worthy of record that these have been committed by persons also holding ordinary " A " licences. I have no evidence to show that such breaches were persistent, and I am inclined to think they arose from a temptation to risk using a contract vehicle to help out their vehicles on work they could only legally perform by their other vehicles.

#### *" A " Licences.*

17. During the year the applications fell due for the " continuation " of " A " licences, which had been granted in 1934 and 1935. In the main licences applied for without modification were not opposed and called for no inquiry.

18. In the cases of eight carriers each of whose business consisted mainly of the carriage of light castings from foundries in the Falkirk area, the Railway Companies vigorously opposed the regrant on the ground that they themselves provided sufficient service. I heard all these cases together. The inquiry occupied more than a week. A number of the largest manufacturers in the light castings industry gave evidence on behalf of the applicants.

19. Falkirk depends largely on this trade and consequently the proceedings attracted much attention from that district where they were referred to as " The Battle of Falkirk ". The extensive building that has been in progress in recent years has greatly increased the demand for these goods and this was reflected in a growth in the demands being made on carriers. I decided not to curtail the service being given by these carriers, but did not grant the additional vehicles which some of them had sought. Appeals were lodged against these decisions, but were subsequently withdrawn.

20. There was a decline in the number of applications by newcomers for public carriers' licences to 42 as compared with 55 last year. Of this number 12 were granted, 8 refused, 18 withdrawn and 4 are still to be decided.

21. In the majority of cases where carriers' businesses had " changed hands " the circumstances justified the consequent applications being regarded as coming within the provisions of Section 11 (3) (b). I did, however, refuse 11 such applications as the businesses being sold were practically defunct.

22. While the process of absorption of smaller carriers by larger concerns has shown an increase, it is by no means widespread. The Railway Companies and road carrying companies associated with them have purchased several

businesses. A firm of bus operators operating in the south-west of the Area has during the year continued the policy commenced last year of buying up public carriers and now have a fleet of 26 vehicles and one trailer. A bus company in the west of Scotland has also entered the carrying trade; in this case by purchasing three businesses which had gone into liquidation. They have authority in this Area to operate 29 vehicles and three trailers. They also hold licences in three other Areas, their total authorised fleet being 58 vehicles and three trailers.

23. Additions were made to the number of vehicles authorised in licences held by the London Midland and Scottish and London and North Eastern Railway Companies, the total number of vehicles being increased from 316 to 341. New bases have been introduced. The main purpose of these vehicles is for the collection and delivery of rail-borne traffic.

24. One licence-holder authorised to use 40 vehicles went out of business. It is significant that there were no applications for additional vehicles from other licence-holders in the district to balance this loss of facilities, although it was referred to as a contributory cause in two or three cases.

25. I append below a statement showing the number of vehicles authorised under "A" (including "A" Contract) licences at 30th April, 1936, and 30th June, 1937.

	Excluding Contract.	30th April, 1936.	30th June, 1937.	
Railway Companies ... ..		316	341	+ 25
Other Operators ... ..		5,191	5,158	- 33
		<u>5,507</u>	<u>5,499</u>	- 8
	Contract.			
Other Operators ... ..		168	331	+ 163
Totals ... ..		<u>5,675</u>	<u>5,830</u>	+ 155

26. The percentage increases in the number of vehicles owned by and authorised to Railway Companies and other operators respectively can be shown as follows:—

1. <i>Railway Companies.</i>		1936.	1937.
Ordinary "A" only ... ..		316	341
	Increase = 7.91 per cent.		
2. <i>Other Operators.</i>			
Ordinary "A" ... ..		5,191	5,158
	Decrease = 0.63 per cent.		
Contract ... ..		168	331
	Increase = 97.02 per cent.		
Ordinary "A" + Contract ... ..		5,359	5,489
	Increase = 2.43 per cent.		
3. All "A" licensed vehicles ... ..		5,675	5,830
	Increase = 2.73 per cent.		

27. The numbers of persons holding "A" licences were:—

		1936.	1937.
Ordinary ... ..		1,384	1,293 - 91
Contract ... ..		85	158 + 73
		<u>1,469</u>	<u>1,451 - 18</u>

The number of ordinary "A" licence-holders has, therefore, fallen by 6.6 per cent. and the number of contract licence-holders has increased by about 86 per cent. Most of the carriers with contract licences also hold ordinary "A" licences, some 25 are in possession of contract licences only. The chief cause of the decline in the number of licensees was absorption.

#### "B" Licences.

28. In this class there was also a decrease in the number of applications from newcomers from 284 last year to 227 for this year. Of these 106 were granted, 61 refused, 33 withdrawn and 27 are still to be decided.

29. The position of "B" licence-holders may now be regarded as stabilised. The majority of them hold their third licence and only 8 per cent. sought modification when applying for regrant. This was a much smaller percentage than

last year, when first adjustments after a year's experience were being made. Of the variations sought many were withdrawn and of those remaining, few had really sound cases to justify the change asked for. A number of licences have lapsed without renewal being asked for. Some of these have been given up in favour of "C" licences. Other carriers have stated that the high rate of insurance premiums demanded of "B" licence-holders led to their decision.

30. Between April, 1936, and June, 1937, the number of "B" licence-holders increased by 21 from 1,813 to 1,834. The numbers of vehicles authorised increased by 39 from 2,937 to 2,976. The percentage increase in "B" licensed vehicles was 1.33.

31. In cases where no modifications were proposed and no objections were lodged, I decided applications for "A" and "B" licences without public inquiry, unless it was necessary to bring the applicants before me for inquiry as to alleged irregular practices.

#### *"C" Licences.*

32. A very large number of licences and identity certificates fell due for regrant on the 1st July of this year. I wish to record in this report that by hard work the staff succeeded in issuing these by the statutory date. The only "C" licences not issued by 1st July were those cases in which the applicants had not returned properly completed forms within the time prescribed by the regulations and those of travelling showmen, these latter by reason of their migratory habits.

33. The general renewal of "C" licences disclosed that many of these carriers had gone out of business or had disposed of their vehicles without notification. I had thought that the introduction of "C" identity certificates in October, 1936, had accounted for most of these, but it now appears that many must have received and not troubled to return certificates for which they had no use.

34. During the year new applications for "C" licences were received at the rate of over 100 per month. However, such is the wastage, the actual increase in "C" licence-holders and "C" licensed vehicles has been moderate, as will be seen by a comparison of the relative positions at 30th April, 1936, and 30th June, 1937.

			<i>April, 1936.</i>	<i>June, 1937.</i>	<i>Increase.</i>	<i>Percentage.</i>
Licence-holders	...	...	9,843	10,260	417	4.2
Vehicles	...	...	20,384	20,893	509	2.5

35. The proportion of "C" licence-holders who cease to be operators of vehicles in each year is nearly 20 per cent.

36. I find that many agriculturists who at one time held "C" licences have now taken out Agricultural Goods licences for their vehicles. I understand from enquiries made that this step has been taken in most cases, not because of the cost of licence fees, but to avoid the responsibility for keeping records. In 11 cases only were holders of "C" licences authorised under Section 2 (4) to carry goods for others. In each case it was for the purpose of carrying Christmas mails for the Post Office.

#### *Revocation of Licence.*

37. No licence was revoked by me during the year.

#### *Trailers drawn by Private Cars.*

38. There is an increasing number of trailers drawn by private cars owned by farmers residing in the neighbourhood of towns and used for the carriage of milk, live stock and other farm produce. So far I have no reason to believe that there is any widespread breach of the Act by the carriage of goods in these trailers for hire or reward.

#### *Use of Horses in Transport.*

39. A number of applications have come before me during the period under review for "A" and "B" licences from the owners of horse-drawn vehicles who proposed changing over to motor vehicles. The great preponderance of such carriers are content to seek "B" licences with a limited radius. Nevertheless, I would say that the days of horse transport are far from finished in this Area and many horse-drawn vehicles are still with us in both country and town.

*Refusals: Reasons in writing Section 6 (3).*

40. Six applicants have asked for reasons for my refusal of their applications. In one case the request was followed by an appeal.

*Appeals.*

41. During the year under review 17 appeals were lodged. There were five outstanding from the previous year making a total of 22. Of these 10 were withdrawn, five dismissed, four allowed and one Order made for a re-hearing leaving two cases outstanding.

*Examination of Vehicles.*

42. The following tables (Table I, II and III) show the number of examinations made, prohibition notices issued and defects mainly responsible for the issue of such notices:—

TABLE I.—*Examination of Vehicles.*

	<i>Total.</i>
1. Authorised vehicles including trailers ... ..	29,358
2. Vehicles examined (a) ... ..	11,012
3. Inspections made (a) ... ..	15,157

(a) Includes exempted vehicles and vehicles licensed in other Areas.

TABLE II.—*Prohibition Notices Issued.*

	<i>Total.</i>	<i>Per cent.</i>
1. Vehicles prohibited (Home) ... ..	1,497	—
2. Vehicles prohibited (Other Areas) ... ..	97	—
3. Prohibitions issued ... ..	1,687	100
4. Immediate prohibition ... ..	579	34
5. Delayed prohibition ... ..	1,108	66

(These figures include exempted vehicles.)

TABLE III.—*Defects mainly responsible for issue of Prohibition Notices.*

The 1,687 prohibition notices issued cover 7,350 defects to vehicles, and of these the defects mainly responsible for the issue of such notices were:—

	<i>Total.</i>	<i>Per cent.</i>
1. Brakes ... ..	1,729	23
2. Steering ... ..	1,374	19
3. Road wheels and axles ... ..	1,089	15
4. Springs, shackles, etc. ... ..	931	13

43. No appeals were made against the refusal by an examiner to remove a prohibition.

44. Accidents reported by the police numbered 24. These reports were followed up by investigation and appropriate action.

45. As in the previous year road "checks" were arranged in many districts and undertaken jointly by the Police and Examiners. The following figures indicate the results obtained from these road checks and show that roughly one out of every six vehicles examined on the road was defective.

	<i>Total.</i>
Vehicles examined at checks ... ..	= 3,225
Prohibitions issued ... ..	= 514
Immediate prohibitions ... ..	= 163
Delayed prohibitions ... ..	= 351
Reported to Police for prosecution ... ..	= 154

*Enforcement Staff.*

46. In my report of last year I referred to the fact that the number of traffic examiners under my control had been increased. During the year under review I was, therefore, in a much more advantageous position to investigate specific complaints of offences and to exercise a greater degree of control upon the careless and lawless operator.

47. One way in which the reduction or elimination of offences is being effected is by a systematic examination of all records completed by drivers and

preserved by licence-holders of all classes in accordance with Section 16 (4) of the Act. It is my intention to proceed with this type of examination until the records of all operators to whom I have granted licences have been examined.

48. The licensing Act has now been in force for three years and the statutory restriction of driving hours for almost seven years and I am seriously concerned at the large number of cases reported by my examiners where records inspected by them contain evidence of breaches of Section 19 of the Road Traffic Act, 1930.

49. Records have also been found to show other breaches of licence conditions, including misuse of "A" contract licences, disregard of special conditions attached to "B" licences and the use of "C" licensed vehicles for hire or reward.

50. The number of prosecutions arising from the examination of records of offenders has increased considerably over last year's figures, but I have preferred in a number of cases, which seemed to justify leniency, to issue a warning to offenders. I am hopeful that this leniency will not be misplaced.

51. It is almost unknown now for a licence-holder to fail to keep records. In many cases, however, the methods adopted fall short of the requirements of the regulations and advice is given by the examiners followed by further inspection, which usually reveals compliance.

52. The number of special investigations undertaken, as a result of information received that operators were transgressing against licences, has shown a marked increase. Generally such information was found to be reliable. Whilst this does not mean that either a prosecution or conviction has necessarily followed in each case, it does mean that the illegalities have been discontinued.

53. I made reference in my last year's report to a continuous "check" over a period of 48 hours, which had taken place at Abington. Whilst this check resulted in many suspensions of vehicles and convictions of carriers and drivers, it was clear that during the second day news of the check had spread and so it lost much of its value.

54. During this year with a view to preserving the necessary element of surprise, a series of checks of shorter duration were carried out with the co-operation of the police authorities. Records, identity certificates and heavy goods drivers' licences were examined by traffic examiners; vehicle examiners devoted their attention to the mechanical condition of the vehicles, while the police completed the process by an examination of Road Fund Licences, certificates of insurance, ordinary driving licences, etc. In all, 21 such checks were carried out covering nearly every part of the Area, rural and industrial alike. In some cases, two checks in different parts of the same district were carried out concurrently. Drivers could not, therefore, be sure that by a deviation of route they would escape a check of which they had received warning.

55. The high proportion of mechanical defects detected by the vehicle examiners is referred to elsewhere in this report.

56. I summarise below the results of the checks in so far as they resulted in prosecutions for licensing offences.

Road Traffic Act, 1930.	
Section 19 (Excessive hours) ... ..	1
Road and Rail Traffic Act, 1933.	
Section 1 (Unlicensed vehicles) ... ..	10
Section 9 (1) (Breach of "B" licence conditions) ... ..	3
Section 18 (Failure to produce records) ... ..	4
Keeping of Records Regulations dated 5.4.35 ... ..	83
Licences and Prohibitions Regulations dated 26.3.36 ... ..	15
Road Traffic Act, 1934.	
Section 31 ... ..	9
	<hr/>
	125
	<hr/>

In addition 12 warnings were sent. Although only one conviction under Section 19 of the Road Traffic Act, 1930, was obtained as a result of observations during these checks, valuable information was derived from records examined which subsequently led to a number of other convictions for excessive hours.

57. As the year progressed it became apparent that cases in which drivers were unable to produce satisfactory records were becoming fewer.

58. In any cases where evidence of excessive hours was found, a complete check of the licence-holders records was made as soon as possible and these examinations on occasion led to additional material for a prosecution being forthcoming.

59. In too many cases, I am afraid, the record shown on demand is not a true one and falsification is still a common occurrence.

60. I am greatly indebted to the police authorities in my Area for their co-operation with my officers, not only in connection with the pre-arranged checks, but also for the help given by examiners in the course of their ordinary duties. Without this aid my officers would have had to confine their activities much more to towns where stationary goods vehicles are likely to be encountered.

#### *Drivers' Hours.*

61. I have in a previous paragraph referred to this matter and indicated how serious is the prevalence of illegality. The number of prosecutions on this account has greatly increased since last year. In not a few cases an examination of the records of a carrier has revealed hundreds of offences over consecutive periods of six months or less. Some idea of the prevalence of these offences may be gained by mentioning that the total charges based on examination of records by my traffic examiners on which convictions were obtained were:—

Section 19 (1) (i)	...	...	...	...	...	...	...	3,559
Section 19 (1) (ii)	...	...	...	...	...	...	...	1,146
Section 19 (1) (iii)	...	...	...	...	...	...	...	139

62. In connection with these charges 84 operators and 47 drivers were convicted and fines amounting to £599 10s. were imposed.

63. The total number of cases, including those taken directly by the police, was 222. In 179 of these cases convictions were obtained, while eight were dismissed, the remaining 35 being outstanding.

64. Many operators attempt to explain away these offences by attributing them to inaccuracy on the part of their drivers in the completion of records particularly in that they omit to record their rest periods. A too free acceptance of such an excuse would render conviction very difficult. It was essential to secure a definite ruling from the higher Court so in one case where I had failed to obtain a conviction at the Sheriff Court, it was taken to the High Court of Justiciary in Scotland. This Court laid down the principle that once records showing excessive hours had been produced by the licence-holders for inspection by an authorised person, they afforded such strong evidence of the offence that it could only be rebutted by the production of the clearest contrary evidence. This decision has had considerable effect. Nevertheless, I do not prosecute offenders where I have felt justified in accepting pleas of inaccuracy.

65. There was another case of considerable importance; that of a firm of aerated water manufacturers who on being convicted under Section 19 of the Road Traffic Act, 1930, in the lower Court appealed to the High Court of Justiciary in Scotland against the decision. They contended that their employees were as much salesmen as drivers and that a great part of their time was occupied in canvassing customers, in effecting deliveries from their vehicles and recovering "empties". This time, it was urged, should be excluded from any computation of driving time. The appeal was dismissed and the learned judges pointed out that the admission of such a principle as had been put forward would render the whole of the section inoperative in practice.

66. There is a tendency in some of the Courts to express the view that as in the case before them the maximum driving period had been exceeded by only half an hour or so it could not be treated as a serious offence, apparently overlooking the fact that Parliament had fixed certain hours as the maxima which, if exceeded, are likely to engender fatigue and thus render the driver a source of danger to himself and other road users and that these periods being the utmost permitted by law should not be looked upon as the normal. It is not possible to extend any consideration to the licence-holder who by habitually taking advantage of the full period allowed deliberately risks infringement.

67. On the other hand, penalties imposed in most Courts for excessive driving hours have now become much heavier and the practice of looking upon this offence as a simple technical one is not so common as it was. This may be due to the widespread publicity which the subject has received of late and to a desire to curb all factors which tend to produce road accidents. There is still, however, rather a wide disparity in the degrees of seriousness with which some offences are regarded in different parts of the Area and the leniency in some districts is quite marked.

68. There is a certain amount of deliberate law-breaking by the falsification of records. Detection is difficult, but close inspection on suspected cases, whilst not always successful in revealing sufficient evidence for action, has good effects by compelling observance for fear of the consequences.

69. It is my opinion that excessive hours are most common in the case of long distance "A" drivers and certain retail distributive trades. The frequency with which bakers, grocers and aerated water manufacturers holding "C" licences have been convicted of this offence is striking; certain Co-operative Societies are also in undesirable prominence in this respect.

#### *Breaches of Licence Conditions.*

70. As has already been stated the most common offence is that of excessive hours; failure to maintain vehicles in a fit mechanical condition is next on the list and then comes improper record-keeping. Were this last offence as easy to detect as others, it might well come highest on the list. The number of convictions for offences in this matter of records has doubled in the past year. This increase is mainly due, I think, to the larger staff at my disposal for enforcement work. A high proportion of these offences can be put down to the carelessness of drivers and are not made the subject of prosecution. Very frequently licence-holders do not take any steps to ensure that records handed over to them are complete. I find it effective to deal with such cases by warning the licence-holders at public inquiries, pointing out that a continuance of such conduct may imperil their licences.

71. Excessive speed is another offence of serious frequency. There is a tendency with some licence-holders to place the responsibility for this offence entirely upon their drivers. This attitude is, on occasion, justifiable but is not reasonable where the records themselves indicate that journeys have been performed with such speed that the average itself is in excess of the legal maximum. Carriers who employ others to drive must accept responsibility and in many cases there is no doubt the excessive speed is attributable to the instructions under which the driver is working. This subject is now receiving special attention by my examiners and some prosecutions are pending, based on the evidence of the records.

72. To a lesser degree there have been complaints that "B" licence-holders have been doing work which their licences did not entitle them to perform. Here again prompt investigation has usually had results.

73. One form of offence which now seems to have ceased is the use of "A" licensed vehicles by the licensee for the carriage of his own goods. Carriers who require such use of their vehicles and who originally acquired "A" licences have now rectified their error.

74. There were during the year 167 convictions for operating vehicles without carriers licences. This figure shows very little difference from last year. The delinquents are mainly persons who hold no carriers licence whatever and those who, having "C" licences, have added or replaced vehicles without giving notification.

75. Only two "C" licence-holders who neglected to renew their licences have been convicted. They had not only been sent their renewal forms, but also later on reminders of the need to apply for a new licence.

#### *Use of Vehicles under suspension.*

76. Convictions for this offence have not diminished since last year. I regard this offence as particularly serious and propose to take it into account when considering the regrant of licences.

77. The following convictions for offences under the Acts and Regulations were recorded:—

Charges brought and Convictions recorded against Operators and Drivers of Goods Vehicles for contravention of the following Acts and Regulations, during the period 1.10.36 to 30.9.37.

Offence.	No. of Summonses issued.	Successful.	Unsuccessful.	Outstanding.
<i>Road Traffic Act, 1930.</i> ..				
1. Section 19. Excessive hours ... ..	222	179	8	35
2. Section 112 (2). Road Traffic Act, 1930 ...	5	5	—	—
<i>Road and Rail Traffic Act, 1933.</i>				
3. Section 1.—(1). Using an unauthorised vehicle for the carriage of goods ... ..	187	167	10	10
4. Section 2.—(2). Using a vehicle authorised under a public carrier's "A" licence for the carriage of goods in connection with a trade or business other than the licence holder's business as carrier ...	1	1	—	—
5. Section 2.—(4). Using a vehicle authorised under a private carrier's "C" licence for the carriage of goods for hire or reward ... ..	10	9	—	1
6. Section 9.—(1). Failing to comply with conditions attached to licence ... ..	25	21	—	4
7. Section 16.—(1). Failure to keep records or to cause records to be kept ... ..	338	306	18	14
8. Section 17.—(10). Use of a goods vehicle while under prohibition ... ..	24	24	—	—
9. Section 18.—(1). Failure to produce records ...	46	43	1	2
10. Section 34. Fraudulent alterations and fraudulent use of documents ... ..	3	2	1	—
11. Goods Vehicles (Licences and Prohibitions). Contraventions of regulations dated 26.3.36 ...	188	171	9	8
12. Goods Vehicles (Keeping of Records). Contravention of regulations dated 5.4.35 ... ..	875	814	17	44
<i>Road Traffic Act, 1934.</i>				
13. Section 31.—(1). Driving heavy goods vehicles without licences ... ..	70	61	5	4
14. Contraventions of Heavy Goods Vehicles (Drivers' Licences) Regulations, dated 4th February, 1935, and 25th November, 1936 ... ..	12	10	1	1
15. Motor Vehicles (Construction and Use Regulations, dated 10.1.31 and 24.3.37 and amendment thereto) ... ..	1,337	1,138	103	96

#### *Heavy Goods Vehicles Drivers' Licences.*

78. A feature of the licensing procedure was the introduction, during the course of the year, of the provisions of Section 2 of the Road Traffic (Driving Licences) Act, 1936. This legislation enabled vocational "learners" to acquire actual experience on heavy goods vehicles while under proper supervision before passing the driving test and 1,262 provisional licences for this purpose have been issued since 1st January, 1937. Provisional licences to drive additional classes of vehicles numbered 38.

79. During the year 3,610 licences were issued as compared with 3,194 in the previous year. Figures indicative of the applications received and their disposal are as follows:—

Applications brought forward from 1935-36 ... ..	109
Applications since received ... ..	4,299
Applications granted and substantive licences issued ... ..	3,610
Applications refused:—	
(a) Failure to pass driving test ... ..	42
(b) Other reasons (including failure to arrange test) ... ..	264
Applications withdrawn ... ..	140
Applications awaiting decision (driving tests, etc.) ... ..	352



80. The number of drivers licensed in the Southern Scotland Area at 30th September, 1937, was approximately 12,400.

81. Of the 1,606 new applicants who obtained heavy goods vehicle drivers' licences, roughly 40 per cent. were granted dispensation from a driving test in accordance with the provisions of Section 31 Sub-section (6) of the Road Traffic Act, 1934. An undesirable aspect of this matter was the frequency with which claims for exemption from a test proved on investigation to be without foundation.

82. I desire to put on record that I hold the view that it is not in the public interest that the matter of personal character cannot be taken into account by me when considering applications for these licences.

83. The undernoted figures relate to driving tests conducted by examiners:—

Tests carried out	...	...	...	...	...	...	1,075
Passed at first test	...	...	...	...	...	...	918
Failed first test: passed subsequent test	...	...	...	...	...	...	52
Awaiting further test	...	...	...	...	...	...	4
Failed entirely and licence refused:—							
(a) First test	...	...	...	...	...	...	38
(b) Subsequent test	...	...	...	...	...	...	4

84. Seventy-two applicants were tested by other authorised persons, and of these no failures were recorded.

85. Three licences were revoked; two for contravention of Section 15 of the Road Traffic Act, 1930, and one for reckless driving.

86. No appeals have been made to Courts of Summary Jurisdiction against my action in revoking or refusing licences.

#### *Conclusion.*

87. In conclusion, I desire once again to acknowledge the assistance given by the Police Authorities throughout the Area and to those Local Authorities who have provided accommodation for Public Inquiries.

I have the honour to be,

Sir,

Your obedient Servant,

A. HENDERSON,

Licensing Authority.

**APPENDIX.**

**Statistical Information as to Goods Vehicles authorised  
under Carriers Licences at 30th June, 1937.**

TABLE I.—Number of Holders of the several classes of Licence in each Traffic Area at 30th June, 1937, and at 30th April, 1936.  
ALL OPERATORS.

Particulars of Licence-holders.	Year.	Traffic Area.												All Traffic Areas. (c)
		Northern.	Yorkshire	North Western.	West Midland.	East Midland.	Eastern.	South Wales.	Western.	South Eastern.	Metro-politan.	Northern Scotland.	Southern Scotland.	
Number of licence-holders ...	1937	No. 10,430	No. 23,599	No. 33,655	No. 21,364	No. 18,933	No. 14,189	No. 10,406	No. 20,765	No. 20,460	No. 43,045	No. 7,817	No. 12,938	No. 237,601
	1936	9,844	22,385	29,719	19,573	17,981	12,757	9,355	19,557	16,909	37,625	6,963	12,700	215,368
Per cent. of Licence-holders in all Areas ...	1937	Per cent. 4.39	Per cent. 9.93	Per cent. 14.16	Per cent. 8.99	Per cent. 7.97	Per cent. 5.97	Per cent. 4.38	Per cent. 8.74	Per cent. 8.61	Per cent. 18.12	Per cent. 3.29	Per cent. 5.45	Per cent. 100.00
	1936	4.57	10.40	13.80	9.09	8.35	5.92	4.34	9.08	7.85	17.47	3.23	5.90	100.00
Number of Holders of each Class of Licence :—														
Holders of :—														
" A " Licences (Currency and Short Term) (a) ...	1937	No. 1,373	No. 2,915	No. 3,924	No. 2,421	No. 1,889	No. 1,397	No. 708	No. 1,648	No. 1,267	No. 4,231	No. 684	No. 1,293	No. 23,750
	1936	1,465	3,133	4,170	2,652	2,014	1,516	767	1,751	1,413	4,662	721	1,384	25,648
" A " Contract Licences	1937	187	384	413	401	295	159	83	227	146	775	39	158	3,267
	1936	95	205	258	225	191	108	43	149	120	584	21	85	2,084
" B " Licences (Currency and Short Term) (a) ...	1937	1,490	3,053	4,873	3,684	3,079	1,845	1,825	3,103	3,115	4,698	1,483	1,813	34,061
	1936	1,501	3,095	4,788	3,583	3,126	1,937	1,771	3,119	3,119	4,801	1,426	1,834	34,100
" C " Licences (Currency and Short Term) (a) ...	1937	7,925	18,189	25,527	16,059	14,562	11,427	8,147	16,655	16,682	35,147	5,901	10,260	186,481
	1936	7,148	16,664	21,394	13,964	13,392	9,733	7,059	15,218	12,780	29,015	5,011	9,843	161,221
Total (b) ...	1937	10,975	24,541	34,737	22,565	19,825	14,828	10,763	21,633	21,210	44,851	8,107	13,524	247,559
	1936	10,209	23,097	30,610	20,424	18,723	13,294	9,640	20,237	17,432	39,062	7,179	13,146	223,053
Per cent. of all Licence-holders in each Area :—														
" A " Licences (Currency and Short Term) ...	1937	Per cent. 12.51	Per cent. 11.88	Per cent. 11.29	Per cent. 10.73	Per cent. 9.53	Per cent. 9.42	Per cent. 6.58	Per cent. 7.62	Per cent. 5.97	Per cent. 9.43	Per cent. 8.44	Per cent. 9.56	Per cent. 9.59
	1936	14.35	13.56	13.62	12.99	10.76	11.40	7.96	8.65	8.11	11.93	10.05	10.53	11.50
" A " Contract Licences ...	1937	1.70	1.56	1.19	1.78	1.49	1.07	0.77	1.05	0.69	1.73	0.48	1.17	1.32
	1936	0.93	0.89	0.85	1.10	1.01	0.81	0.45	0.74	0.69	1.50	0.29	0.65	0.93
" B " Licences (Currency and Short Term) ...	1937	13.58	12.44	14.03	16.32	15.53	12.45	16.96	14.34	14.69	10.48	18.29	13.41	13.76
	1936	14.70	13.40	15.64	17.54	16.70	14.57	18.37	15.41	17.89	12.29	19.86	13.95	15.29
" C " Licences (Currency and Short Term) ...	1937	72.21	74.12	73.49	71.17	73.45	77.06	75.69	76.99	78.65	78.36	72.79	75.86	75.33
	1936	70.02	72.15	69.89	68.37	71.53	73.22	73.22	75.20	73.31	74.28	69.80	74.87	72.28
Total ...	1937	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
	1936	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00

Notes:—(a) A person holding both a currency and a short term licence is counted as one licence-holder—for the purpose of the Tables relating to the position at 30th April, 1936, published in November, 1936, such a person was counted as two licence-holders.

TABLE II.—Number of licences of each class, number of vehicles authorised thereunder, and average number of vehicles per licence at 30th June, 1937, and at 30th April, 1936.

AGGREGATE FIGURES—ALL TRAFFIC AREAS.

	Year.	" A " Licences (including Short Term).			" A " Contract.			" B " Licences (including Short Term).	" C " Licences (including Short Term).			All Licences.		
		Railway Cos.	Others.	Total.	Railway Cos.	Others.	Total.	Others.*	Railway Cos.	Others.	Total.	Railway Cos.	Others.	Total.
No. of Licences ... ..	1937	386	24,085	24,471	8	4,409	4,417	34,589	5	186,729	186,734	399	249,812	250,211
	1936	203	25,869	26,072	11	2,833	2,844	34,320	5	161,530	161,535	219	224,552	224,771
No. of Vehicles authorised :—														
(i) Motor Vehicles in possession ... ..	1937	9,615	74,011	83,626	19	7,456	7,475	53,775	75	362,305	362,380	9,709	497,547	507,256
	1936	9,045	76,292	85,337	17	5,139	5,156	52,809	78	316,636	316,714	9,140	450,876	460,016
(ii) Motor Vehicles to be hired ... ..	1937	54	468	522	—	33	33	170	—	6,629	6,629	54	7,300	7,354
	1936	79	956	1,035	—	39	39	252	—	4,490	4,490	79	5,737	5,816
(iii) Trailers in possession or to be hired ... ..	1937	4,163	7,190	11,353	—	295	295	1,441	3	10,104	10,107	4,166	19,030	23,196
	1936	3,549	7,529	11,078	—	210	210	1,529	—	7,991	7,991	3,549	17,259	20,808
(iv) Trade Plates ... ..	1937	—	—	—	—	—	—	—	8	2,931	2,939	8	2,931	2,939
	1936	—	—	—	—	—	—	—	7	3,022	3,029	7	3,022	3,029
Average No. of Motor Vehicles in possession per Licence ...	1937	24.91	3.07	3.42	2.38	1.69	1.69	1.55	15.00	1.94	1.94	24.33	1.99	2.03
	1936	44.56	2.95	3.27	1.55	1.81	1.81	1.54	15.60	1.96	1.96	21.74	2.01	2.05

\* No Railway Companies operate vehicles under " B " licences.

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TABLE III (A).—Number of Operators (other than Railway Companies) holding "A" (Currency) Licences and Number of Motor Vehicles owned by them and specified in their Licences on 30th June, 1937, and 30th April, 1936.

DISTRIBUTION ACCORDING TO NUMBERS OF MOTOR VEHICLES AUTHORISED ON "A" (CURRENCY) LICENCES OWNED BY EACH OPERATOR HOLDING AN "A" (CURRENCY) LICENCE.

Area.	Year.	Totals.		Analysis based on the undermentioned numbers of "A" Motor Vehicles owned by each Operator.																					
				0.*	1.	2.	3.	4.	5 to 9	10 to 14.	15 to 19.	20 to 24.	25 to 49.	50 to 74.	75 to 99.										
		Operators.	Vehicles.	Operators.	Operators.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.
Northern	1937	No. 1,371	No. 3,713	No. 4	No. 655	No. 318	No. 636	No. 137	No. 411	No. 84	No. 336	No. 118	No. 741	No. 33	No. 403	No. 12	No. 205	No. 4	No. 91	No. 5	No. 153	No. —	No. —	No. 1	No. 82
	1936	1,463	3,706	4	738	328	656	144	432	84	336	114	722	32	387	9	155	5	106	4	115	1	59	—	—
Yorkshire	1937	2,913	6,844	5	1,686	549	1,098	256	768	137	548	200	1,238	41	468	13	215	12	260	12	406	1	61	1	96
	1936	3,131	7,110	5	1,848	578	1,156	266	798	148	592	207	1,266	39	444	17	285	11	240	10	338	1	60	1	83
North Western	1937	3,920	11,067	9	2,053	798	1,596	350	1,050	220	880	346	2,170	71	817	27	451	13	281	21	691	8	471	2	169
	1936	4,166	11,075	6	2,279	837	1,674	355	1,065	221	884	334	2,077	61	698	29	481	12	258	23	819	4	232	2	165
West Midland	1937	2,418	6,730	3	1,269	470	940	209	627	125	500	242	1,503	57	644	18	295	6	129	14	481	4	256	1	86
	1936	2,649	6,921	3	1,436	514	1,028	220	660	142	568	243	1,533	48	535	18	296	5	113	17	545	2	122	1	85
East Midland	1937	1,886	4,946	5	1,024	340	680	174	522	95	380	174	1,105	39	445	20	331	6	133	7	223	2	103	—	—
	1936	2,011	4,961	5	1,107	375	750	184	552	96	384	178	1,124	35	396	19	317	5	111	7	220	—	—	—	—
Eastern...	1937	1,394	3,747	6	702	268	536	167	501	75	300	131	842	24	277	5	84	5	104	8	240	3	161	—	—
	1936	1,513	3,961	3	777	296	592	162	486	89	356	141	906	26	302	5	82	4	85	7	208	3	167	—	—
South Wales	1937	706	1,602	1	411	135	270	66	198	33	132	44	277	8	93	5	88	—	—	2	70	1	63	—	—
	1936	765	1,771	1	443	141	282	81	243	28	112	49	301	9	100	8	133	1	20	4	137	—	—	—	—

Western ...	1937	1,645	4,238	4	909	302	604	159	477	80	320	130	845	34	381	10	168	7	159	9	313	1	62	—	—
	1936	1,748	4,410	5	970	340	680	160	480	76	304	137	875	30	327	13	223	5	114	10	309	2	128	—	—
South Eastern	1937	1,265	3,986	2	694	211	422	106	318	61	244	115	724	35	404	19	316	11	243	7	256	1	64	2	177
	1936	1,411	4,178	4	791	237	474	113	339	66	264	121	759	34	403	22	367	12	267	7	261	3	175	1	78
Metro-politan	1937	4,227	20,550	5	2,015	745	1,490	394	1,182	240	960	470	3,037	142	1,640	66	1,104	36	772	74	2,436	18	1,038	4	338
	1936	4,658	21,567	4	2,241	828	1,656	447	1,341	264	1,056	493	3,130	152	1,746	76	1,280	37	804	76	2,523	15	870	6	484
Northern Scotland	1937	682	1,864	1	384	112	224	70	210	43	172	45	294	12	137	5	85	2	41	6	193	2	124	—	—
	1936	719	1,896	2	416	118	236	67	201	43	172	44	282	14	155	6	101	1	20	7	241	1	72	—	—
Southern Scotland	1937	1,291	4,724	3	533	261	522	153	459	86	344	163	1,056	45	518	17	286	13	279	13	430	2	121	2	176
	1936	1,382	4,736	10	606	277	554	142	426	97	388	159	1,010	46	528	17	284	10	213	15	506	1	64	2	157
Total ...	1937	23,718	74,011	48	12,335	4,509	9,018	2,241	6,723	1,279	5,116	2,178	13,832	541	6,227	217	3,628	115	2,492	178	5,892	43	2,524	13	1,124
	1936	25,016	76,292	52	13,652	4,869	9,738	2,341	7,023	1,354	5,416	2,220	13,985	526	6,021	239	4,004	108	2,351	187	6,222	33	1,949	13	1,052

Over 99 vehicles:—

100-149—1937. South Eastern, 1-124; Metropolitan, 8-960; Total, 9-1,084.  
 1936. North Western, 2-248; Metropolitan, 8-1,006; Total, 10-1,254.  
 200-499—1937. North Western, 2-438; Metropolitan, 5-1,849; Total, 7-2,287.  
 1936. Metropolitan, 5-1,687.

150-199—1937. Metropolitan, 4-688.  
 1936. North Western, 1-195; Metropolitan, 5-857; Total, 6-1,052.  
 500 and over—1937. Metropolitan, 1-1,041  
 1936. Metropolitan, 1-886.

\* Operators owning no vehicle but having "hiring allowance" licences.

**TABLE III (B).—Number of Operators (other than Railway Companies) holding "A" (Currency) Licences and Number of Motor Vehicles owned by them and specified in their Licences on 30th June, 1937, and 30th April, 1936.**

DISTRIBUTION ACCORDING TO NUMBERS OF "ALL" MOTOR VEHICLES (WHETHER AUTHORISED ON AN "A", "B" OR "C" LICENCE) OWNED BY EACH OPERATOR HOLDING AN "A" (CURRENCY) LICENCE.

Area.	Year.	Analysis based on the undermentioned numbers of ALL Motor Vehicles owned by each Operator.																							
		Totals.		0.*	1.	2.	3.	4.	5 to 9.	10 to 14.	15 to 19.	20 to 24.	25 to 49.	50 to 74.	75 to 99.										
		Operators.	Vehicles.	Operators.	Operators.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.
Northern	1937	No. 1,371	No. 4,192	No. 2	No. 569	No. 313	No. 626	No. 166	No. 498	No. 104	No. 416	No. 148	No. 921	No. 36	No. 424	No. 22	No. 373	No. 4	No. 90	No. 6	No. 191	No. —	No. —	No. 1	No. 84
	1936	1,463	4,007	2	674	336	672	164	492	93	372	133	814	36	430	14	235	6	134	4	123	1	61	—	—
Yorkshire	1937	2,913	7,731	5	1,504	582	1,164	300	900	160	640	260	1,602	50	589	21	345	14	312	15	518	1	61	1	96
	1936	3,131	7,792	4	1,695	612	1,224	309	927	174	696	240	1,473	49	569	18	301	15	322	13	441	1	60	1	84
North Western	1937	3,920	12,503	9	1,826	855	1,710	404	1,212	245	980	403	2,508	88	1,004	32	527	16	343	27	911	10	624	2	169
	1936	4,166	12,159	6	2,089	883	1,766	407	1,221	244	976	381	2,356	74	841	31	517	14	307	26	920	5	278	2	165
West Midland	1937	2,418	7,954	3	1,071	479	958	252	756	178	712	294	1,841	84	973	23	377	14	304	12	416	5	297	3	249
	1936	2,649	7,740	3	1,277	529	1,058	273	819	174	696	274	1,737	69	770	21	346	8	172	18	628	1	67	2	170
East Midland	1937	1,886	6,013	5	883	349	698	196	588	124	496	228	1,452	55	633	24	399	7	154	10	309	3	163	1	79
	1936	2,011	5,773	4	984	384	768	213	639	119	476	217	1,356	52	587	21	353	7	154	7	209	1	51	1	95
Eastern...	1937	1,394	4,302	6	618	267	534	190	570	91	364	157	1,011	32	368	15	244	6	132	9	285	3	176	—	—
	1936	1,513	4,412	3	693	301	602	190	570	102	408	162	1,031	35	417	11	179	5	107	8	234	3	171	—	—
South Wales	1937	706	1,900	1	370	134	268	68	204	45	180	62	389	12	136	8	138	1	23	4	129	1	63	—	—
	1936	765	1,977	1	408	152	304	76	228	37	148	64	402	11	127	9	152	2	41	5	167	—	—	—	—

Western...	1937	1,645	4,965	4	781	311	622	181	543	111	444	180	1,164	45	534	11	185	6	130	13	441	2	121	—	—
	1936	1,748	4,929	5	856	357	714	188	564	92	368	182	1,158	35	403	13	224	7	157	11	357	2	128	—	—
South Eastern	1937	1,265	4,575	2	661	205	410	104	312	65	260	133	845	38	420	27	462	14	305	10	351	1	64	4	358
	1936	1,411	4,642	4	768	221	442	124	372	73	292	128	830	38	438	28	485	11	242	10	346	3	178	3	249
Metro-politan	1937	4,227	23,755	5	1,833	734	1,468	439	1,317	258	1,032	524	3,363	171	1,967	79	1,321	48	1,030	87	2,915	22	1,318	4	335
	1936	4,658	24,372	4	2,076	833	1,666	491	1,473	290	1,160	526	3,362	170	1,973	83	1,402	53	1,146	86	2,946	16	953	6	508
Northern Scotland	1937	682	2,145	1	330	131	262	75	225	50	200	62	392	13	152	6	103	5	112	7	245	2	124	—	—
	1936	719	2,077	2	375	132	264	80	240	42	168	54	339	17	188	6	103	2	43	8	285	1	72	—	—
Southern Scotland	1937	1,291	5,290	2	473	250	500	168	504	97	388	192	1,243	57	665	16	269	13	277	18	586	2	123	3	262
	1936	1,382	5,179	8	552	275	550	159	477	100	400	185	1,162	51	586	21	348	9	193	17	556	3	193	2	162
Total ...	1937	23,718	85,325	45	10,919	4,610	9,220	2,543	7,629	1,528	6,112	2,643	16,731	681	7,865	284	4,743	148	3,212	218	7,297	52	3,134	19	1,632
	1936	25,616	85,059	46	12,447	5,015	10,030	2,674	8,022	1,540	6,160	2,546	16,020	637	7,329	276	4,645	139	3,018	213	7,212	37	2,212	17	1,433

Over 99 vehicles:—

100-149—1937. South Eastern, 1-127; Metropolitan, 9-1,110; Total, 10-1,237.

1936. North Western, 1-100; East Midland, 1-101; Metropolitan, 10-1,295; Total, 12-1,496.

200-499—1937. North Western, 3-689; Metropolitan, 5-1,915; Total, 8-2,604.

1936. North Western, 1-254; Metropolitan, 7-2,429; Total, 8-2,683.

150-199—1937. East Midland, 1-159; Metropolitan, 7-1,206; Total, 8-1,365.

1936. North Western, 2-369; Metropolitan, 6-1,046; Total, 8-1,415.

500 and over—1937. Metropolitan, 2-1,625.

1936. Metropolitan, 1-937.

\* Operators owning no vehicle but having "hiring allowance" licences.



TABLE IV (A).—Number of Operators (other than Railway Companies) holding "B" Licences and number of Motor Vehicles owned by them and specified in their Licences on 30th June, 1937, and 30th April, 1936.

DISTRIBUTION ACCORDING TO NUMBERS OF MOTOR VEHICLES AUTHORISED ON "B" LICENCES OWNED BY EACH OPERATOR HOLDING A "B" LICENCE.

Area.	Year.	Totals.		Analysis based on the undermentioned numbers of "B" Motor Vehicles owned by each Operator.																	
				0*	1.	2.	3.	4.	5 to 9.	10 to 14.	15 to 19.	20 to 24.	25 to 49.								
		Operators.	Vehicles.	Operators.	Operators.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.
Northern ... ..	1937	No. 1,490	No. 2,219	No. 13	No. 1,081	No. 242	No. 484	No. 76	No. 228	No. 39	No. 156	No. 36	No. 215	No. 2	No. 24	—	—	—	—	No. 1	No. 31
	1936	1,501	2,167	8	1,118	233	466	74	222	35	140	32	190	—	—	—	—	—	—	1	31
Yorkshire ... ..	1937	3,053	4,132	21	2,392	427	854	119	357	38	152	48	280	7	74	—	—	1	23	—	—
	1936	3,095	4,149	14	2,451	428	856	108	324	43	172	45	269	5	54	—	—	1	23	—	—
North Western ... ..	1937	4,873	6,721	22	3,946	570	1,140	167	501	65	260	82	503	11	131	3	47	4	87	2	56
	1936	4,788	6,567	12	3,899	561	1,122	148	444	72	288	72	444	12	137	6	103	6	130	—	—
West Midland ... ..	1937	3,684	5,639	23	2,723	565	1,130	182	546	72	288	100	601	9	114	6	106	—	—	4	131
	1936	3,583	5,326	19	2,705	519	1,038	171	513	70	280	80	476	11	132	5	86	1	23	2	73
East Midland ... ..	1937	3,079	4,468	34	2,330	434	868	143	429	53	212	66	394	17	191	—	—	2	44	—	—
	1936	3,126	4,490	26	2,401	435	870	132	396	43	172	73	443	13	150	1	15	2	43	—	—
Eastern ... ..	1937	1,845	2,694	2	1,406	281	562	78	234	26	104	43	267	4	44	5	77	—	—	—	—
	1936	1,937	2,829	3	1,481	280	560	88	264	29	116	47	283	4	47	5	78	—	—	—	—
South Wales ... ..	1937	1,825	2,555	3	1,404	269	538	83	249	34	136	28	180	4	48	—	—	—	—	—	—
	1936	1,771	2,436	—	1,373	260	520	88	264	21	84	26	163	3	32	—	—	—	—	—	—

Western ... ..	1937	3,103	4,666	15	2,360	421	842	147	441	65	260	74	447	11	127	7	113	1	20	2	56
	1936	3,119	4,578	12	2,413	415	830	131	393	60	240	70	425	10	120	5	81	1	20	2	56
South Eastern ... ..	1937	3,115	5,764	10	2,063	547	1,094	230	690	103	412	122	767	17	187	13	215	4	87	5	153
	1936	3,119	5,657	6	2,127	520	1,040	209	627	97	388	120	766	22	256	8	135	5	111	4	119
Metropolitan ... ..	1937	4,698	9,933	2	3,142	735	1,470	338	1,014	152	608	213	1,336	52	610	33	531	6	132	17	545
	1936	4,801	9,820	2	3,252	758	1,516	328	984	142	568	209	1,322	52	614	28	450	8	175	16	531
Northern Scotland ... ..	1937	1,483	2,069	2	1,131	231	462	60	180	37	148	19	115	3	33	—	—	—	—	—	—
	1936	1,426	1,915	2	1,119	209	418	49	147	29	116	17	103	1	12	—	—	—	—	—	—
Southern Scotland ... ..	1937	1,813	2,915	6	1,285	293	586	114	342	49	196	52	308	7	75	5	81	2	42	—	—
	1936	1,834	2,875	4	1,322	301	602	97	291	52	208	45	272	7	74	5	80	—	—	1	26
Total ... ..	1937	34,061	53,775	153	25,263	5,015	10,030	1,737	5,211	733	2,932	883	5,413	144	1,658	72	1,170	20	435	31	972
	1936	34,100	52,809	108	25,661	4,919	9,838	1,623	4,869	693	2,772	836	5,156	140	1,628	63	1,028	24	525	26	836

Over 49 vehicles—

50-74—1937. North Western, 1-50; Metropolitan, 6-367; Total, 7-417.  
1936. Metropolitan, 4-244.

75-99—1937. South Eastern, 1-96; Metropolitan, 2-178; Total, 3-274.  
1936. South Eastern, 1-88; Metropolitan, 2-164; Total, 3-252.

\* Operators owning no vehicle but having "hiring allowance" licences.

TABLE IV (B).—Number of Operators (other than Railway Companies) holding "B" Licences and number of Motor Vehicles owned by them and specified in their Licences on 30th June, 1937, and 30th April, 1936.

DISTRIBUTION ACCORDING TO NUMBERS OF "ALL" MOTOR VEHICLES (WHETHER AUTHORISED ON AN "A", "B" OR "C" LICENCE) OWNED BY EACH OPERATOR HOLDING A "B" LICENCE.

Area.	Year.	Totals.		Analysis based on the undermentioned numbers of ALL Motor Vehicles owned by each operator.																							
				0.*	1.	2.		3.		4.		5 to 9.		10 to 14.		15 to 19.		20 to 24.		25 to 49.		50 to 74.		75 to 99.		100 to 149.	
		Operators.	Vehicles.	Operators.	Operators.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.
Northern ...	1937	No. 1,490	No. 3,160	No. 9	No. 862	No. 301	No. 602	No. 143	No. 429	No. 63	No. 252	No. 89	No. 533	No. 10	No. 114	No. 8	No. 132	No. 3	No. 64	No. 1	No. 28	—	—	—	—	No. 1	No. 144
	1936	1,501	2,938	6	942	300	600	111	333	53	212	69	422	11	132	5	80	2	44	1	42	—	—	—	—	1	131
Yorkshire ...	1937	3,053	5,959	20	2,007	550	1,100	207	621	93	372	129	775	29	340	5	80	5	113	4	129	1	53	1	95	2	274
	1936	3,095	5,665	12	2,119	544	1,088	196	588	75	300	106	648	25	280	7	115	5	108	3	116	—	—	2	171	1	138
North Western	1937	4,873	8,926	19	3,437	778	1,556	259	777	126	594	191	1,205	30	350	11	179	7	157	11	355	3	155	—	—	—	—
	1936	4,788	8,532	11	3,445	740	1,480	242	726	118	472	171	1,062	29	325	13	214	8	182	8	235	1	50	1	87	—	—
West Midland	1937	3,684	8,228	19	2,247	661	1,322	288	864	145	580	229	1,423	58	677	11	184	12	262	11	399	1	53	1	86	1	131
	1936	3,583	7,365	15	2,313	621	1,242	248	744	140	560	166	1,038	48	551	14	242	8	177	8	312	—	—	1	75	1	111
East Midland	1937	3,079	6,688	27	1,944	532	1,064	231	693	107	428	176	1,070	37	432	10	161	2	45	8	264	2	134	1	79	—	—
	1936	3,126	6,353	22	2,040	560	1,120	197	591	103	412	141	849	41	475	8	135	5	111	5	162	1	67	1	95	1	101
Eastern ...	1937	1,845	4,246	2	1,173	330	660	131	393	63	252	100	627	22	253	12	198	3	67	3	109	2	134	2	161	2	219
	1936	1,937	4,206	2	1,249	339	678	153	459	56	224	99	617	20	236	6	94	4	87	3	105	3	182	2	172	1	103
South Wales	1937	1,825	3,204	3	1,234	312	624	133	399	53	212	72	452	10	112	3	50	3	66	2	55	—	—	—	—	—	—
	1936	1,771	2,990	—	1,225	311	622	113	339	40	160	65	400	12	143	3	50	1	21	1	30	—	—	—	—	—	—
Western ...	1937	3,103	6,461	12	1,972	532	1,064	230	690	126	504	159	966	42	486	11	182	9	199	9	285	—	—	—	—	1	113
	1936	3,119	6,054	8	2,080	514	1,028	211	633	101	404	148	916	34	396	5	83	12	254	5	156	—	—	—	—	1	104

48205	South Eastern	1937	3,115	7,303	10	1,808	586	1,172	293	879	141	564	192	1,207	34	382	23	384	15	321	10	323	1	74	2	189	—	—
	1936	3,119	7,019	5	1,896	577	1,154	260	780	123	492	172	1,087	42	489	24	403	6	135	10	312	3	183	1	88	—	—	
Metropolitan	1937	4,698	18,316	2	2,567	895	1,790	431	1,293	207	828	357	2,244	94	1,099	59	992	13	279	41	1,383	12	748	6	511	4	450	
	1936	4,801	16,930	2	2,783	852	1,704	414	1,242	208	832	333	2,081	80	933	47	792	19	411	35	1,174	9	532	9	771	1	118	
Northern Scotland	1937	1,483	2,833	—	968	285	570	104	312	43	172	58	342	11	129	5	80	5	112	4	148	—	—	—	—	—	—	
	1936	1,426	2,459	—	982	271	542	81	243	29	116	46	272	9	109	3	50	2	42	3	103	—	—	—	—	—	—	
Southern Scotland	1937	1,813	4,588	6	1,045	347	694	154	462	86	344	123	781	29	346	9	149	5	112	5	149	2	102	1	79	—	—	
	1936	1,834	4,336	4	1,123	339	678	135	405	74	296	108	666	25	286	12	196	4	89	8	245	1	74	—	—	—		
Total ...	1937	34,061	79,912	129	21,264	6,109	12,218	2,604	7,812	1,253	5,012	1,875	11,625	406	4,720	167	2,771	82	1,797	109	3,627	24	1,453	14	1,200	11	1,331	
	1936	34,100	74,847	87	21,197	5,968	11,936	2,361	7,083	1,120	4,480	1,624	10,058	376	4,355	147	2,454	76	1,661	90	2,992	18	1,088	17	1,459	7	800	

Over 149 vehicles—

150-199—1937. East Midland, 1-159; Metropolitan, 3-515: Total, 4-674. 200-499—1937. North Western, 1-251; East Midland, 1-215; Metropolitan, 5-1,658; Southern Scotland, 1-325: Total, 8-2,449.

1936. East Midland, 1-195; Metropolitan, 2-328; Total, 3-523.

1936. North Western, 1-254; Metropolitan, 6-1,872; Southern Scotland, 1-278; Total, 8-2,404.

500 and over—1937. Metropolitan, 2-1,959.

1936. Metropolitan, 1-1,357.

\* Operators owning no vehicle but having "hiring allowance" licences.

TABLE V.—Motor Vehicles owned by Railway Companies at 30th June, 1937, and  
30th April, 1936.

Area.	Operators*	Vehicles under :—	
		" A " Currency licences, 1937.	All licences, 1936.
Northern ... ..	2	542	479
Yorkshire ... ..	2	1,095	1,132
North Western ... ..	4	1,327	1,313
West Midland ... ..	3	1,119	956
East Midland ... ..	3	665	596
Eastern ... ..	3	462	372
South Wales ... ..	2	236	248
Western ... ..	3	695	681
South Eastern ... ..	2	289	281
Metropolitan ... ..	4	2,829	2,762
Northern Scotland ... ..	2	74	54
Southern Scotland ... ..	2	282	266
Total ... ..		9,615†	9,140

\* These are the same for 1937 and 1936.

† The Railway Companies also operate the following vehicles :—

Under " C " licence—in Yorkshire Area ... ..	1
in Metropolitan Area ... ..	74
Under Contract " A " licence—in West Midland Area	1
in East Midland Area	1
in South Wales Area...	5
in Western Area ... ..	12

TABLE VI.—Distribution of Operators (other than Railway Companies) and Motor Vehicles owned by them according to Types of Licence held at 30th June, 1937, and at 30th April, 1936.

Area.	Year.	Types of Licence held.																	
		" A " Currency only.		" A " Contract only.		" A " Currency and " A " Contract.		" B " only.		" C " only.		" A " and " B."		" A " and " C."		" B " and " C."		" A," " B" and " C."	
		Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.	Operators.	Vehicles.
Northern... ..	1937	1,110	2,694	32	51	95	479	1,131	1,539	7,664	14,275	135	621	37	385	198	841	26	159
	1936	1,282	3,002	15	20	49	272	1,236	1,697	6,962	12,690	112	505	33	268	146	689	7	47
Yorkshire ... ..	1937	2,443	5,169	92	145	192	1,036	2,448	3,106	17,747	31,212	234	875	70	559	331	1,667	40	311
	1936	2,756	5,697	48	73	119	835	2,589	3,329	16,312	27,138	212	801	53	366	274	1,346	20	189
North Western ... ..	1937	3,351	8,714	135	270	196	1,300	4,117	5,257	25,024	47,756	325	1,443	72	583	397	1,525	34	701
	1936	3,715	9,140	98	158	117	961	4,113	5,277	20,935	39,909	276	1,240	62	489	374	1,544	25	471
West Midland ... ..	1937	1,843	4,319	74	126	185	1,105	2,865	3,946	15,509	29,305	335	1,654	66	634	422	2,084	62	544
	1936	2,192	5,095	48	74	119	719	2,954	4,123	13,583	25,932	289	1,406	45	381	304	1,561	36	277
East Midland ... ..	1937	1,456	3,330	71	113	133	753	2,426	3,249	14,160	26,331	282	1,307	31	246	335	1,558	36	574
	1936	1,659	3,710	51	84	84	460	2,554	3,432	13,023	24,146	235	1,051	35	252	303	1,455	34	415
Eastern ... ..	1937	1,109	2,487	36	49	90	563	1,418	1,913	11,041	17,050	106	492	65	539	281	1,556	40	285
	1936	1,267	2,983	31	63	56	370	1,557	2,134	9,399	15,008	110	472	64	427	242	1,390	28	210
South Wales ... ..	1937	577	1,156	18	22	35	200	1,543	2,037	7,936	11,605	84	374	13	105	182	655	16	138
	1936	661	1,395	7	10	19	121	1,535	2,042	6,878	10,507	71	338	17	81	156	524	9	86
Western ... ..	1937	1,272	2,765	56	77	94	696	2,446	3,319	16,184	26,320	239	999	53	430	385	1,851	33	292
	1936	1,458	3,439	55	85	59	358	2,569	3,496	14,824	23,557	194	787	39	289	337	1,617	19	154
South Eastern ... ..	1937	1,104	2,868	34	57	56	705	2,595	4,422	16,115	27,743	87	685	34	253	407	1,832	26	364
	1936	1,272	3,213	37	66	43	516	2,692	4,583	12,410	23,929	83	570	26	276	326	1,528	18	338
Metropolitan ... ..	1937	3,470	10,802	228	419	351	4,953	3,579	6,148	34,121	86,950	270	1,763	173	5,302	770	8,663	79	1,742
	1936	3,981	12,553	181	313	273	5,167	3,884	6,728	28,241	73,698	277	1,773	144	4,090	586	7,051	54	1,378
Northern Scotland ... ..	1937	556	1,310	7	12	16	141	1,230	1,637	5,750	7,776	105	516	3	94	138	567	10	113
	1936	626	1,482	4	8	9	110	1,233	1,604	4,893	7,150	77	321	3	89	108	452	8	82
Southern Scotland ... ..	1937	1,050	3,378	32	75	75	813	1,378	2,294	9,928	18,748	141	675	38	282	268	1,318	26	301
	1936	1,187	3,603	24	40	44	635	1,477	2,102	9,583	18,358	122	647	26	167	220	1,407	15	180
Total ... ..	1937	19,341	48,992	815	1,416	1,518	12,744	27,176	38,867	181,179	345,071	2,343	11,404	655	9,412	4,114	24,117	428	5,524
	1936	22,056	55,312	599	994	991	10,524	28,393	40,547	157,043	302,022	2,058	9,911	547	7,175	3,376	20,564	273	3,827

TABLE VII (A). Nature of Business carried on by holders of "B" Licences in all Traffic Areas at 30th June, 1937, and 30th April, 1936

Nature of business.	No. of Licences.	
	1937.	1936.
Agricultural and Forage Merchants ... ..	348	384
Bakers and Confectionery and Ice-Cream Dealers and Manufacturers ... ..	104	106
Brick, Breeze-block, Tile and Artificial Stone Manufacturers and Merchants ... ..	127	138
Builders, Builders' Merchants and Public Works Contractors, Plumbers, Decorators and Gasfitters, etc. ... ..	2,692	2,834
Butchers and Bacon Curers ... ..	188	240
Caterers, Inn-keepers and Hotel Proprietors ... ..	91	93
Chemical Manufacturers and Dealers ... ..	41	61
Colliery Proprietors, Coal, Coke and Peat Merchants and Agents... ..	13,682	13,749
Co-operative Societies ... ..	76	66
Coopers, Manufacturers of and Dealers in Wooden Boxes, Fencing, Rustic Furniture, etc., and Firewood ... ..	438	467
Corn and Grain Merchants and Millers ... ..	442	479
Engineers, General and Electric ... ..	205	278
Farmers, Dairymen and Livestock Dealers (including Poultry Farmers) ... ..	2,205	2,224
Fish Merchants and Curers and Poultry Dealers ... ..	396	393
Fruit and Potato Merchants, Greengrocers and Florists ... ..	1,925	2,150
Furnishers, Furniture Dealers and Upholsterers ... ..	1,435	1,426
General Dealers ... ..	855	832
Glass, Cullet, Bottle, Pottery and Earthenware Manufacturers and Merchants ... ..	58	59
Grocers and Provision Merchants ... ..	454	488
Ice and Salt Merchants ... ..	80	87
Iron and Brass Founders and Merchants and Blast Furnace Proprietors ... ..	103	112
Ironmongers and Hardware Dealers ... ..	79	82
Joiners, Carpenters and Cabinet Makers ... ..	109	135
Leather, Hide and Skin Manufacturers and Merchants ... ..	47	57
Mineral Water Manufacturers and Retailers ... ..	69	71
Motor Engineers, Coachbuilders, Cycle Dealers and Garage Proprietors ... ..	1,316	1,331
Musical Instrument and Radio Dealers ... ..	64	61
Newsagents, Booksellers and Retail Tobacconists ... ..	109	108
Nurserymen and Market Gardeners and Garden Contractors ... ..	572	638
Petrol, Kerosene and Oil Merchants, Refiners and Distillers ... ..	65	74
Public Service Vehicle Operators ... ..	109	152
Quarry Owners and Mine Owners (other than Colliery Proprietors) ... ..	156	180
Removal Contractors and Warehousemen ... ..	219	258
Sand and Gravel Merchants and Diggers ... ..	1,176	1,162
Scrap Metal Dealers ... ..	170	198
Slaughterers ... ..	57	67
Textile Manufacturers and Merchants ... ..	48	56
Timber Merchants, Saw Millers and Saw-dust Contractors ... ..	544	552
Miscellaneous ... ..	3,207	2,252
Totals ... ..	34,061	34,100

TABLE VII (B). Classes of goods authorised to be carried for hire or reward by holders of " B " Licences in all Traffic Areas at 30th June, 1937, and 30th April, 1936.

Class of goods.	No. of Licences.	
	1937.	1936.
General Goods ... ..	17,556	17,689
Agricultural products, feeding stuffs for animals and poultry, fertilisers, implements and farm requisites ... ..	4,971	4,803
Alcoholic and other beverages ... ..	364	333
Builders' materials and plant, road making and repairing materials, sand, ballast, and gravel and excavated materials and rubbish... ..	11,273	10,473
Camp and sports equipment and toys ... ..	491	468
Chemicals, drugs, dyes and explosives ... ..	246	246
Clothing and drapery ... ..	108	103
Coal, coke, and patent fuel ... ..	6,176	5,529
Cotton and cotton goods (other than clothing and drapery) ... ..	345	349
Dairy produce and requisites (other than milk) ... ..	277	302
Electrical goods and apparatus ... ..	165	156
Empties ... ..	186	106
Factory and other waste ... ..	226	192
Fish, ice, poultry and game ... ..	748	785
Fishermen's gear and requisites ... ..	101	102
Food products and canned goods, groceries and provisions, bread and confectionery ... ..	1,056	1,049
Fruit, flowers and greengrocery, and garden produce, materials and requisites (including nurserymen's produce and requisites)... ..	2,314	2,357
Furniture and household effects (including personal effects) ... ..	12,332	12,051
Grain, flour and millers' products ... ..	494	485
Iron and Steel (crude, pig, blooms, billets and ingots) and ores ... ..	240	221
Iron and Steel (bars, plates, sheets and manufactured articles) ... ..	348	375
Ironmongery and hardware ... ..	160	148
Livestock ... ..	3,069	3,006
Machines and machinery ... ..	1,075	1,109
Meat ... ..	527	514
Metals, other than Iron and Steel (bars, plates, sheets and manufactured articles) ... ..	188	164
Milk ... ..	429	430
Monumental masonry and sculpture ... ..	288	263
Musical instruments and radio apparatus ... ..	264	291
Paint, oils, tar, varnish, glue, etc. ... ..	298	272
Paper, cardboard and paper-making materials and wastepaper ... ..	204	172
Parcels and luggage ... ..	741	675
Post Office mails ... ..	257	180
Pottery, glass and earthenware ... ..	185	175
Printed matter and stationery (including books and newspapers) ... ..	351	329
Scrap metal ... ..	486	447
Sugar beet, beet pulp, and molasses ... ..	326	355
Textiles, raw materials and products (other than cotton, wool, clothing and drapery) ... ..	391	400
Theatrical scenery and equipment, and show and fair ground tackle and equipment ... ..	98	107
Wood and manufactures thereof ... ..	1,477	1,461
Wool and Woollen goods (other than clothing and drapery) ... ..	274	292
Goods (not defined) for specified customers ... ..	3,881	3,517
Goods of customers to whom vehicle is hired ... ..	253	227
Miscellaneous (not included previously) ... ..	1,158	655
Totals ... ..	76,397	73,363

In some cases licensees were permitted to carry goods in more than one of the categories.



**TABLE VII (C) Some important Classes of goods authorised to be carried for hire or reward by certain classes of holders of "B" Licences in all Traffic Areas at 30th June, 1937.**

Nature of Business.	Number of Licences.	Classes of Goods.					
		General Goods.	Agricultural products, feeding stuffs for animals and poultry, fertilisers, implements and farm requisites.	Builders' materials and plant, road making and repairing materials, sand, ballast and gravel and excavated materials and rubbish.	Coal, coke and patent fuel.	Fruit, flowers and greengrocery and garden produce, materials and requisites (including nurserymen's produce and requisites).	Furniture and Household Effects (including personal effects).
Colliery Proprietors, Coal, Coke and Peat Merchants and Agents ...	13,682	8,212	2,077	5,438	4,105	864	6,190
Builders, Builders' Merchants and Public Works Contractors, Plumbers, Decorators and Gasfitters, etc. ...	2,692	1,030	247	1,804	359	127	454
Farmers, Dairymen and Livestock Dealers (including Poultry Farmers)	2,205	1,040	841	387	196	133	387
Fruit and Potato Merchants, Greengrocers and Florists ...	1,925	803	193	306	199	538	977
Furnishers, Furniture Dealers and Upholsterers ...	1,435	200	10	53	13	22	1,382
Motor Engineers, Coachbuilders, Cycle dealers and Garage Proprietors ...	1,316	807	118	228	116	36	261
Sand and Gravel Merchants and Diggers	1,176	574	111	812	158	62	190

In some cases licensees were permitted to carry goods in more than one of the categories.

TABLE VIII.—Classes of Goods Authorised to be carried for Hire or Reward under "B" Licences over Permitted Zone of Operation in All Areas at 30th June, 1937, and Totals at 30th April, 1936.

Classes of Goods.	Permitted Zone of Operation.											Total.	
	Goods not limited to Specified Persons.						Goods for specified persons, whether distance is limited or not.	Goods to specified destination.	Goods in one direction only.	Goods lifted within a specified district.	Special limiting conditions not falling within any of the previous categories.	1937.	1936.
	Not exceeding 10 miles.	Exceeding 10 but not exceeding 20 miles.	Exceeding 20 but not exceeding 30 miles.	Exceeding 30 but not exceeding 50 miles.	Exceeding 50 but not exceeding 100 miles.	Exceeding 100 miles and un-limited.							
General goods ... ..	2,866	6,449	3,893	2,017	688	339	644	136	36	180	308	17,556	17,689
Agricultural products, feeding stuffs for animals and poultry, fertilisers, implements and farm requisites ... ..	699	1,100	1,027	890	275	136	401	186	54	120	83	4,971	4,803
Alcoholic and other beverages ... ..	29	57	30	34	16	13	170	6	3	4	2	364	333
Builders' materials and plant, road making and repairing materials, sand, ballast and gravel, and excavated materials and rubbish ... ..	1,866	3,461	2,222	1,345	368	196	1,425	112	41	93	144	11,273	10,473
Camp and sports equipment and toys ... ..	15	32	43	81	63	131	75	19	3	9	20	491	468
Chemicals, drugs, dyes and explosives ... ..	24	34	28	24	13	10	102	6	1	—	4	246	246
Clothing and drapery ... ..	19	18	20	16	7	3	24	—	—	—	1	108	103
Coal, Coke, and patent fuel ... ..	3,498	982	326	195	51	43	883	72	22	55	49	6,176	5,529
Cotton and Cotton goods (other than clothing and drapery) ... ..	25	52	55	72	16	3	111	5	1	2	3	345	349
Dairy produce and requisites (other than milk) ... ..	26	52	49	47	14	3	33	32	3	10	8	277	302
Electrical goods and apparatus ... ..	7	32	19	15	11	3	76	2	—	—	—	165	156
Empties ... ..	9	9	11	10	6	11	27	36	52	4	11	186	106
Factory and other waste ... ..	81	48	20	13	7	5	38	10	1	2	1	226	192
Fish, ice, poultry and game ... ..	140	131	83	71	25	25	73	89	21	43	47	748	785
Fishermen's gear and requisites ... ..	9	14	17	14	12	7	4	3	1	5	15	101	102
Food products and canned goods, groceries and provisions, bread and confectionery ... ..	287	182	148	109	45	7	220	22	7	13	16	1,056	1,049
Fruit, flowers and greengrocery and garden produce, materials and requisites (including nurserymen's produce and requisites) ... ..	448	514	266	221	72	48	281	243	100	55	66	2,314	2,357
Furniture and household effects (including personal effects) ... ..	1,596	2,085	1,857	2,360	926	1,694	352	79	77	814	492	12,332	12,051
Grain, flour and millers' products ... ..	62	84	76	51	18	10	115	33	14	25	6	494	485
Iron and Steel (crude, pig, blooms, billets, and ingots) and Ore ... ..	97	51	19	23	13	3	27	5	—	—	2	240	221
Iron and Steel (bars, plates, sheets and manufactured articles) ... ..	60	57	37	28	24	8	117	10	1	—	6	348	375

TABLE VIII (continued)

Classes of Goods.	Permitted Zone of Operation.											Total.	
	Goods not limited to Specified Persons.						Goods for specified persons, whether distance is limited or not.	Goods to specified destination.	Goods in one direction only.	Goods lifted within a specified district.	Special limiting conditions not falling within any of the previous categories.	1937.	1936.
	Not exceeding 10 miles.	Exceeding 10 but not exceeding 20 miles.	Exceeding 20 but not exceeding 30 miles.	Exceeding 30 but not exceeding 50 miles.	Exceeding 50 but not exceeding 100 miles.	Exceeding 100 miles and unlimited.							
Ironmongery and hardware ... ..	19	28	33	18	7	4	46	1	—	2	2	160	148
Livestock ... ..	142	431	566	627	322	341	138	220	11	136	135	3,069	3,006
Machines and machinery ... ..	95	144	150	178	90	71	302	17	5	7	16	1,075	1,109
Meat ... ..	101	103	97	76	24	10	67	25	6	11	7	527	514
Metals, other than Iron and Steel (bars, plates, sheets and manufactured articles) ... ..	18	31	21	18	7	7	80	4	2	—	—	188	164
Milk ... ..	63	88	73	39	13	10	82	36	9	5	11	429	430
Monumental masonry and sculpture ... ..	16	31	25	49	21	19	116	2	1	4	4	288	263
Musical instruments and radio apparatus ... ..	16	35	45	51	20	32	44	5	1	7	8	264	291
Paint, oils, tar, varnish, glue, etc ... ..	45	55	38	21	16	10	96	5	5	5	2	298	272
Paper, cardboard and paper-making materials and waste paper ... ..	20	33	25	26	12	4	64	12	1	2	5	204	172
Parcels and luggage ... ..	162	104	74	84	38	47	98	38	6	31	59	741	675
Post Office mails ... ..	97	25	9	10	4	18	60	4	—	2	28	257	180
Pottery, glass and earthenware ... ..	21	28	17	22	18	11	56	8	3	—	1	185	175
Printed matter and stationery (including books and newspapers) ... ..	72	61	34	35	12	25	77	15	2	10	8	351	329
Scrap metal ... ..	114	115	67	58	21	6	86	12	4	1	2	486	447
Sugar Beet, Beet pulp and Molasses ... ..	20	46	42	22	5	3	14	141	9	22	2	326	355
Textiles, raw material and products (other than cotton, wool, clothing and drapery) ... ..	56	86	66	52	20	8	85	9	—	2	7	391	400
Theatrical scenery and equipment, and show and fair ground tackle and equipment ... ..	6	14	7	15	11	20	15	2	3	1	4	98	107
Wood and manufactures thereof ... ..	195	312	246	245	90	55	252	32	9	18	23	1,477	1,461
Wool and woollen goods (other than clothing and drapery) ... ..	17	61	54	65	20	6	31	8	2	2	8	274	292
Goods (not defined) for specified customers ... ..	—	—	—	—	—	—	3,881	—	—	—	—	3,881	3,517
Goods of customers to whom vehicle is hired ... ..	4	6	9	11	5	54	30	—	1	2	131	253	227
Miscellaneous (not included above) ... ..	128	183	117	130	79	128	292	37	13	12	40	1,159	655
Totals ... .. 1937	13,290	17,464	12,061	9,488	3,525	3,587	11,210	1,739	531	1,716	1,787	76,398	73,363
... .. 1936	11,954	17,156	11,990	9,833	3,796	3,911	10,029	1,578	380	1,549	1,187		

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*NOTE.—Letters are inserted to show the reports in which the references occur.*

A.—Northern; B.—Yorkshire; C.—North-Western; D.—West Midland; E.—East Midland;  
F.—Eastern; G.—South Wales; H.—Western; K.—South-Eastern; N.—Metropolitan;  
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THE  
MYSORE MOTOR TRANSPORT  
..  
COMMITTEE

1932-33

VOLUME I  
REPORT AND PROPOSITIONS



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## PERSONNEL OF THE COMMITTEE.

---

Sir Charles Todhunter, K.C.S.I., J.P., (*Chairman*).

Mr. B. Abdur Rahmon, B.A.

„ B. K. Garudachar.

„ F. A. Hamilton, C.I.E.

Khan Bahadur Pheroshaw Pollanjee.

Mr. B. S. Puttaswamy, B.A., B.L.

„ S. K. Rajagopala Iyer, B.A.

„ H. V. Ramasvami, M.A., B.L.

„ M. G. Rangaiya, B.A., B.E.

„ H. Rangachar, M.A., (*Secretary*).



BANGALORE,  
2nd April 1933.

### MOTOR TRANSPORT COMMITTEE.

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The Committee appointed in G. O. No. P. 21-29—Legis. 36-32-3, dated the 10th October 1932, to enquire into the matter of the regulation and taxation of motor transport, beg to submit their report.

The Committee have held twelve meetings and have examined 47 witnesses. They have also received a large amount of literature from other States and Provinces, and desire to express their special acknowledgments in this respect to Mr. N. N. Ayyangar, Deputy Secretary to the Government of Bombay, Public Works Department, to the officials of the Indian Roads and Transport Development Association, and to the Report of Messrs. Mitchell and Kirkness, which reached them just in time for consideration in connection with the latter part of their enquiry.

Owing to pressure of time, the form in which the Report is presented is unusual. It can best be explained by a reference to the procedure adopted by the Committee. This was, as the study of each branch of the subject was completed, for a note to be prepared for presentation to the Committee, together with a series of propositions arising out of the note. The Committee then discussed and modified the propositions so prepared, and made a record in their proceedings of the reasons for the amendments made. What is now presented to the Government is (1) a complete list of the propositions as finally arrived at, backed by (2) a copy of the notes on which the original propositions were based, and (3) a copy of the proceedings which explain the reasons why some of these were modified.

The Report is presented in this form in view of the fact that it is understood that the Dewan desires to be in possession of the recommendations of the Committee before he leaves for Europe, and of the fact that the general conference on the Mitchell-Kirkness Report is to be held on the 24th April 1933. It can be replaced, if the Government so desire, by a coherent report, in which the original notes are modified in terms of the subsequent proceedings, and the propositions take their place as a summary of the whole. As, however, the Simla Conference is likely to involve far-reaching decisions on the whole subject, it may perhaps be doubted if it is worth while to recast the material collected by the Committee in the manner suggested.

While realising that the scheme of taxation that they put forward is far from ideal, the Committee think it right to point out that it has been arrived at only after a prolonged consideration of different alternatives and a prolonged balancing of the claims of different interests; and they feel they are entitled to ask that it be considered as a whole, and that single features of it, which may have been adjusted to meet the claims of other parts of the scheme, should not be considered as if they stood alone.

The Committee desire to record their acknowledgments to Mr. H. Rangachar, M.A., whose intimate knowledge of the railway side of the case, coupled with his untiring industry in the study of the other aspects of it, has been of the greatest value to them, and also to the members of the staff, Messrs. Zia Muhammad, B.A., Hanumanthappa and Vancheswara Iyer, B.A., who have shown unfailing diligence in the duties allotted to them.

P. POLLANJEE,  
 B. A. RAHMUN,  
 M. G. RANGAIYA,  
 F. A. HAMILTON,  
 S. K. RAJAGOPALA IYER,  
 B. K. GARUDACHAR,  
 B. S. PUTTASWAMY,  
 H. V. RAMASVAMI,

*Members.*

H. RANGACHAR,  
*Secretary.*

C. G. TODHUNTER,  
*Chairman.*

## PROPOSITIONS.

### Introductory.

1. The development of motor transport has introduced a new factor in the life of nations. [1]\*
2. While this is beneficial in its general results, it has given rise to many problems. [2 to 5]
3. The progress of social organisation has not kept pace with that of invention. [2 to 5]
4. The growth of vested interests has increased the difficulties. [2 to 5]
5. The whole world is now in process of dealing with the problems raised. [7]
6. In the case of problems connected with railways, the chief directions in which remedies are being sought are:—
  - (a) Co-ordination of policy;
  - (b) Substitution of co-ordination in practice for competition;
  - (c) Improvement of the railway services;
  - (d) The granting of complete or partial monopolies of road services to railway companies. [10 to 64]

### Stage Carriages.

7. In the case of the bus traffic generally, there is a tendency everywhere, with one or two exceptions, to a greater or less degree of State control, extending in extreme cases to complete socialisation. [10 to 64]
8. The system adopted under the English Road Traffic Act seems to be the best adapted to meet the difficulties that have arisen in Mysore. [240]
9. Under this system, the licensing of public service vehicles is entrusted to Commissioners, who are required to satisfy themselves as to—
  - (a) the suitability of the route or routes for the traffic;
  - (b) the extent to which the needs of the proposed routes are adequately served;
  - (c) the extent to which the proposed service is desirable in the interest of the public;
  - (d) the needs of the area as a whole in relation to traffic;
  - (e) the co-ordination of all forms of passenger transport, including transport by rail. [12]
10. They may also make conditions for securing that:—
  - (1) the fares shall not be unreasonable;
  - (2) the rates shall be so fixed as to prevent, in the public interest, wasteful competition with alternative forms of transport;
  - (3) copies of time and fare tables shall be carried on the vehicle;
  - (4) passengers shall not be set down or picked up at other than specified places.
11. Other important provisions of the Act are—
  - (i) making compulsory the insurance of all motor vehicles against third party risks;
  - (ii) requiring that the wages paid to road service employees shall be fair wages, and providing for appeal by any organisation of employees to the Industrial Courts. [13]
12. The existing system in Mysore is in advance of many others, especially in respect of the levy of taxation on the mileage run. [59 to 65, 75]

\* The numbers in brackets indicate the paragraphs of the Note for the Committee in which the subject is dealt with.

13. The defects that have been noticed arise, not so much out of the rules themselves, as out of the way in which they have been administered. [94]

14. The absence of co-ordination of the policy of district authorities is particularly noticeable. [246]

15. The services could have been run at reasonable profit if reasonable fares had been charged. But the grant of an excessive number of licenses has led to cut-throat competition and widespread loss. [97]

16. The first condition of the improvement of the system is the appointment of a central authority, which should lay down complete conditions governing fares, time-tables, number of vehicles to be run, nature of vehicles to be used, rates of wages and hours of work, and other matters. [95, 238, 254]

17. Another essential should be insurance against third party risks. [117]

18. These conditions being laid down, a definite schedule of services should be framed and licensees for these services should be selected by the central authority, regard being had to the following matters among others:—

(a) the licensees must be of sufficient substance to manage the services efficiently, and to that end, it is desirable that they should make a deposit which can be drawn upon in case of breach of the rules;

(b) some provision for competition should be maintained, but, the rates being fixed, the competition must be in respect of the efficiency of the service;

(c) for services other than inter-provincial services, preference may be given to Mysoreans as against outsiders;

(d) other things being equal, preference should be given to the existing permit holders as against new comers.

(e) it should be a condition of licensing a motor bus service that the licensee has ample garage accommodation.

(f) preference should be given to applicants who can show that they have made adequate provision for running repairs. [96 and 98; Proceedings page 24]

19. The principal tax should still be on the mileage run. [189]

20. If reasonable fares are charged, there is a margin of 2 annas a mile out of which taxes can be paid. [120]

21. In the case of what are known as "Railway Competition Roads," the only logical solution, when the road runs parallel and close to the railway, as in the case of the routes from Bangalore to Chamarajanagar and from Bangalore to Chickballapur, is for the Railway Department to be given the exclusive option of running such services as the controlling authority may lay down. [121, 122]

22. These may include extensions which form feeders to the railway when the controlling authority cannot secure independent licensees to run them. [121, 122]

23. On roads that short-circuit the railway, the railway need not be given a monopoly, but may be favourably considered in making the selection of licensees. [121, 122]

#### Tolls.\*

24. Theoretically, tolls are an unsound method of taxation. Practically, they afford the only means of levying from the bullock cart a payment proportionate to the use made of the metalled roads; and if they are retained for that purpose, it is sound policy to retain them also for the purpose of the taxation of motor vehicles coming from other jurisdictions. [148, 149, 153, 155]

25. Practically, the working of the toll-gates in Mysore is worse than it need be. This is due to the multiplicity of authorities under whose orders tolls are levied, to the confusion of the law and rules, and to the practice of employing the system of farming. [146, 150]

26. Tolls levied in small municipalities are not taxes on transit, nor are they spent on the roads. They are merely terminal taxes, and should be given that name. [152]

---

\* Note.—Mr. Puttaswamy was not wholly convinced in regard to these propositions. While conceding that the Committee's proposals were logical, if only the question of taxation on transport was under consideration, he contended that, when the whole of taxation of all sorts, direct and indirect, was taken into account, the agriculturist was paying more than other classes of the community and therefore should be exempted from tolls.

27. The tolls levied in the Bangalore and Mysore Cities are supplements to the vehicle tax. If, as is proposed later, that tax is made leviable on all cars possessed in the State, the collection of tolls from motor cars at these gates may cease. [167, 196]

28. The Provincial and District Board gates should be managed by one traffic authority, under one law, and distributed throughout the State in such a way as to equalise the burden of the tax so far as possible. These gates should be provided with proper buildings, and with barriers that can be easily seen and quickly removed. The business of the gates should be conducted by a Government staff, in uniform and under proper control, the members of which should also perform duties connected with traffic control and traffic registration. [151, 249]

29. Buses which pay mileage cess should be exempt from tolls. In other cases, tolls should be levied. [149, 172, 180]

30. The rate of tolls levied on bullock carts should be halved. That on lorries of unladen weight of over 30 cwt. should be raised to Rs. 3. [155; Proceedings page 18]

31. The rules relating to exemption from tolls should be drastically revised, and exemptions limited to (1) the case of actual agriculturists, using the roads for agricultural purposes, and (2) the case of privileged persons and of goods belonging to them. It is economically unsound to exempt from tolls goods belonging to a commercial Government Department in order to give them an advantage in competition, and all existing exemptions of this nature should be cancelled. [Proceedings page 18]

32. Active endeavours should be made to popularise the use of wider tyres and better fitting axle-boxes on bullock-carts, and lower rates of tolls should be levied in the case of carts with tyres of a width of over 2½". [154]

33. The Forest Department should compel their contractors to use broad wheeled vehicles, which should pay tolls at the usual rates. All other timber carts should pay at the rate of eight annas for carts with narrow wheels and drawn by two bullocks and four annas for similar carts with broad wheels. [155]

34. The above proposals relate to tolls levied for maintenance. In the case of development works, it is legitimate, after construction of a work, to levy tolls on all traffic for a term of years in order to pay for the work. [156]

35. The following tables exhibit the rates of tolls proposed to be levied and enumerates the exemptions proposed to be given:— [155; Proceedings page 18]

#### BRIEF SCHEDULE OF RATES OF TOLLS.

A. Motor Vehicles.—		Rs.	a.	p.
1.	On every motor cycle with or without a side car ...	0	4	0
2.	On every four-wheeled motor passenger-vehicle constructed to carry less than eight persons ..	1	0	0
3.	On every motor bus as defined in the Mysore Motor Vehicles Rules..	2	0	0
4.	On every motor lorry, the unladen weight of which does not exceed 30 cwt. ..	2	0	0
5.	On every motor lorry, the unladen weight of which exceeds 30 cwt....	3	0	0
6.	On every other four-wheeled vehicle propelled by steam or other motor power ..	3	0	0
B. Other Vehicles.—				
1.	On every four-wheeled carriage ...	0	8	0
2.	On every two-wheeled carriage on springs other than a jutka or ekka.	0	4	0
3.	On every two-wheeled ekka or jutka laden ..	0	2	0
4.	Do do unladen ..	0	1	0
5.	On every other vehicle with springs, including tricycles ...	0	2	0
6.	Do cart or other vehicle drawn by two bullocks, buffaloes, horses, ponies, asses or mules, if laden with goods other than timber ...	0	2	0
7.	Do do do *with timber ..	0	8	0
8.	Do do do if not laden ..	0	1	0

Half of the above rates are leviable on bullock carts with tyres over 2½" wide.

The rates are increased proportionately for carts drawn by a larger number of animals, and reduced for carts drawn by single animals.

\* P. S. by Chairman.—Stone might also have been included.

## EXEMPTIONS FROM TOLLS.

- (i) Vehicles belonging to His Highness the Maharaja and His Highness the Yuvaraja of Mysore.
- (ii) Vehicles belonging to the Hon'ble the Resident in Mysore.
- (iii) Vehicles belonging to the Dewan of Mysore.
- (iv) Vehicles belonging to the Postal Department and used exclusively for the carriage of mails.
- (v) Vehicles belonging to or exclusively engaged by British or Mysore Military or Police Officers in uniform and on duty.
- (vi) Vehicles belonging to members of the traffic staff or to officers of the Public Works Department when engaged on duties connected with the roads within their jurisdiction.
- (vii) Vehicles belonging to the Presidents of District Boards, when used by them on duty within their districts.
- (viii) Vehicles of States or Provinces with which reciprocal arrangements for exemption have been come to.
- (ix) Vehicles belonging to the Sanitary Bureau.
- (x) Vehicles used for ambulance purposes.
- (xi) Motor cycles and cars which have paid the road tax.
- (xii) Motor buses on account of which mileage cess is paid.
- (xiii) Motor lorries that pay service tax.
- (xiv) Motor lorries that pay road tax, when plying within the radius fixed.
- (xv) Carts of agriculturists living within a radius of 5 miles of any toll-gate should be free from tolls in respect of such gates when employed for agricultural purposes.
- (xvi) Bullock carts which within the previous 24 hours have paid tolls at any other Government toll-gate in Mysore.

**Other taxes on the Motor Traffic.**

36. Mileage cess and tolls being accepted as part of the system, it remains to build up round them a balanced scheme of taxation which will be fair to all classes of vehicles. [158]

37. The issues have been a good deal confused by variations in system and by the use of the registration fee for purposes of taxing the traffic. [157, 175, 176, 181]

38. The general tendency is towards adoption of a State or Provincial tax on the basis of seating capacity, weight or area. It is likely that reciprocity will in future depend on payment of this tax, and it is desirable therefore that it should form a part of the system. [161, 162]

39. Another general tendency is to apply an additional tax to vehicles plying for hire.

40. Fees are unnecessarily numerous and should be limited so far as possible. [157]

41. After examining a number of alternatives, the Committee consider that the best general scheme of taxation in the circumstances of Mysore would be one combining the following taxes:—

(a) A 'vehicle' tax, which is partly a tax on status and partly a tax on "availability," and would involve the extension of the existing City Municipal tax throughout the State.

(b) A 'road' tax, which is a payment for use of the roads, throughout the State, and is in effect an optional commutation of tolls. It would be based upon unladen weight.

(c) A 'service' tax, which is a charge for the privilege of plying for hire. This would be based on seating capacity in the case of passenger vehicles and on unladen weight in the case of lorries.

(d) A mileage cess. This is a special charge for the grant of a limited monopoly of the right to ply and pick up and set down passengers along fixed routes.

(e) Tolls.—These are intended primarily for other road users and are the only equitable means of taxing bullock carts for the use of metalled roads. But they also supply a valuable adjunct to the system of taxation of motor vehicles in providing an easy means of collecting their share of road maintenance from cars, whether registered within or outside the State, that have not paid the road tax, and private lorries that are plying outside the fixed radius assigned to them.

42. In applying these taxes it is desirable to maintain the existing City rates for the vehicle tax, and the Madras rates, so far as possible, for the road tax. The rates for the service tax will vary with the nature of the vehicle and the nature of the service. [165, 167, 170]

43. The case of vehicles plying for hire, whether stage or contract carriages, in cities, differs from the case of stage carriages outside, and is subject to a number of special considerations.

All things considered, the fairest way of dealing with these carriages at present seems to be to impose a service tax based on seating capacity at a single rate of Rs. 30 a seat for all classes of carriages, and to remit a number of miscellaneous fees. [190, 191, 192; Proceedings pages 25 and 26]

44. In the following paragraphs, an attempt is made to exhibit the cumulative effect of the Committee's proposals as regards each class of vehicles in turn :—

#### (1) Motor Cycles

(a) should pay a registration fee for purposes of identification at the rate of Rs. 4 for motor cycles below  $3\frac{1}{2}$  horse power, and Rs. 8 for other motor cycles and for motor cycles with side cars.

(b) should pay a vehicle tax of Rs. 10 per annum for motor cycles and Rs. 15 per annum for motor cycles with side cars.

(c) should have the option of paying a road tax at the following rates, or of continuing to pay tolls [165 ; Proceedings pages 20 and 23] :—

(i) Bicycles	...	..	...	...	Rs. 30
(ii) Bicycles, if used for drawing trailers or side cars	...		...	...	40
(iii) Tricycles	...	...	...	...	40

#### (2) Motor Cars

(a) should pay a registration fee for purposes of identification at the following rates :—

For light cars	...	..	...	...	Rs. 16
For heavy cars	...	..	...	...	32

A car registered in some jurisdiction other than the Mysore State or the Civil and Military Station which is freshly registered with a Mysore number should pay a fee of Rs. 8.

(b) should pay a vehicle tax of Rs. 18 per annum for cars below 15 cwt., and Rs. 30 per annum for cars above 15 cwt.

(c) should have the option of paying a road tax at the following rates or of continuing to be liable to tolls [166 ; Proceedings pages 20, 21 and 23] :—

Class of vehicles	For vehicles fitted with pneumatic tyres	For other vehicles
	Annual Tax	Annual Tax
	Rs.	Rs.
<i>Motor vehicles</i>		
(a) weighing not more than 15 cwt., unladen	70	100
(b) weighing more than 15 cwt., but not more than 30 cwt., unladen.	100	150
(c) weighing more than 30 cwt., but not more than 45 cwt., unladen.	130	200
(d) weighing more than 45 cwt., but not more than 60 cwt., unladen.	160	240
(e) weighing more than 60 cwt., unladen	200	300
(f) Additional tax payable in respect of such vehicles when used for drawing trailers—		
(i) for each trailer not exceeding 1 ton in weight unladen.	40	60
(ii) for each trailer exceeding 1 ton in weight unladen.	80	120
Provided that two or more vehicles shall not be chargeable under this class in respect of the same trailer.		

(d) if licensed to ply for hire, should be free of vehicle tax, but should pay a tax on seating capacity of Rs. 30 per seat, excluding the driver's seat, and should be liable to tolls. [192; Proceedings pages 25 and 26]

### (3) Motor Buses

(a) should pay a registration fee for purposes of identification at the following rates :—

Light	...	..	..	Rs. 16
Heavy	..	...	...	.. 32

(b) if not licensed to ply for hire, should pay a vehicle tax of Rs. 60 per annum.

(c) if licensed to ply for hire, but for a strictly limited purpose only, e.g., in the case of a hotel bus, should pay a vehicle tax of Rs. 100 per annum.

(d) if licensed to ply for hire in any other case, should pay a service tax on seating capacity at Rs. 7-8-0 a quarter, or Rs. 30 a year: the driver's and conductor's seats not to be counted in calculating this tax.

(e) should have the option of paying a road tax at the rates shown under motor cars or of continuing to be liable to tolls.

(f) if used as part of a service running on a fixed route in a rural area, should pay mileage cess at 6 pies a mile, and should be exempted from tolls.

(g) There should be no extra charge for railway competition roads, but the Railway Department might be given a partial or complete monopoly subject to their paying the tax on seating capacity and mileage cess.

(h) if licensed to run on special trips, should pay mileage cess at 9 pies per mile and should be exempted from tolls.

(i) should be subject to periodical examination, but should be exempted from inspection fees. [121, 122, 170, 171, 189; Proceedings pages 21, 22, 23 and 26]

### (4) Lorries

(a) should pay registration fee for purposes of identification at the following rates :—

Light	...	..	...	Rs. 16
Heavy, i.e., over 2 tons in weight unladen	...	...	...	.. 32

(b) should pay a road tax on unladen weight at the following rates [174; Proceedings pages 26 and 27]:—

Class of Vehicles	Quarterly tax	
	For vehicles fitted with pneumatic tyres	For other vehicles
	Rs.	Rs.
Motor vehicles used in the course of trade and industry for the transport or haulage of goods or materials, including tricycles weighing more than 8 cwt. unladen.		
(a) Vehicles not exceeding 15 cwt., in weight, unladen ...	30	45
(b) Vehicles exceeding 15 cwt., but not exceeding 25 cwt. in weight, unladen.	50	70
(c) Vehicles exceeding 25 cwt., but not exceeding 30 cwt. in weight, unladen.	70	90
(d) Vehicles exceeding 30 cwt., but not exceeding 35 cwt. in weight, unladen.	90	115
(e) Vehicles exceeding 35 cwt., but not exceeding 50 cwt. in weight, unladen.	112½	150
(f) Vehicles exceeding 50 cwt., but not exceeding 70 cwt. in weight, unladen.	150	185
(g) Vehicles exceeding 70 cwt., but not exceeding 100 cwt., in weight, unladen.	175	225
(h) Additional tax payable in respect of such vehicles when used for drawing trailers.		
(a) For each trailer not exceeding 1 ton in weight, unladen ...	60	85
(b) For each trailer exceeding 1 ton in weight, unladen ...	125	160
Provided that two or more vehicles shall not be chargeable under this clause in respect of the same trailer.	..	...



Lorries with two wheels fitted with solid tyres and others fitted with pneumatic tyres should pay at the rates for those with solid tyres.

(c) should be subject to periodical examination, but should be exempted from inspection fees.

(d) Licenses for private lorries should be granted only when it is established that they are necessary for the applicant's business, and should be limited to a fixed radius. When plying outside that radius such lorries should be liable to tolls.

(e) Lorries licensed to carry goods other than those of the owners should pay a service tax of 50 per cent of the road tax, but should be exempt from tolls.

(f) Lorries and other mechanically propelled vehicles of over five tons should be prohibited from using the roads except on special permission.

(g) Lorries should be prohibited from carrying more than three persons apiece, in addition to the driver, except under a pass given by an authorised person. [173]

45. Drivers and conductors should pay fees at the rates shown below [184]:—

<i>Drivers—</i>		Rs.
First license	... ..	5
Annual renewal	... ..	3
<i>Conductors—</i>		
License	.. ... ..	1

46. The road tax should be leviable quarterly, and a distinctly coloured disc signifying payment of the same should be attached to the wind screen. A disc with a different shape should be issued for vehicles which are exempted from the tax. [179]

47. The Government toll-gate staff should be instructed to allow cars bearing these discs to pass without stopping, but should keep a careful record of vehicles passing their gates both for taxation and for statistical purposes. [151, 179]

48. It is the duty of the Municipal Authority to provide stands for vehicles licensed to ply for hire. [187]

49. The necessity for the provision of places for parking private cars is likely shortly to arise, and the Municipal and Traffic Authorities should be prepared to meet it. [188]

#### Finance.

50. The Committee have been asked to report on the question of the best method of maintenance of roads under the new conditions. [193]

51. For this purpose, the first thing to be done is to estimate the revenue likely to be available. The following are the details of the Committee's estimate of recurring revenues. [206; Proceedings page 26]:—

		Rs.
Registration fees	... ..	9,600
Drivers' and conductors' licenses	... ..	11,480
Fees for the possession and transport of petrol	.. ..	3,530
Service tax	... ..	29,000
Road tax	... ..	6,89,910
Vehicle tax	... ..	9,000
Mileage cess	... ..	3,91,000
Share of the Local Fund Cess	... ..	3,80,000
Tolls	... ..	1,50,000
Fines and forfeitures	... ..	20,000
Contribution of the general taxpayer	... ..	6,75,000
Total	... ..	23,68,520

52. In addition to these revenues, there is a revenue applicable to development purposes under the following heads. [207, 208]:—

		Rs.
The share of excise duty on petrol	... ..	3,00,000
Interest on railway cess fund	... ..	1,50,000

53. In addition to this again is the capital of the railway cess fund, which is never likely to be expended on railways, amounting to 29 lakhs. [209, 210]

*Erratum.*—In the above table, the figure under 'Service tax' should be Rs. 5,12,190, and that under 'Road tax' Rs. 1,77,720, the total remaining unchanged.

54. On the expenditure side there have to be dealt with five classes of roads [212] :—

Class I roads	Miles
(a) With very heavy traffic ... ..	453
(b) With heavy traffic ... ..	725
Class II roads	
Other main trunk roads and arterial roads ...	1,737
Class III roads	
Other metalled roads ... ..	1,509
Class IV roads	
Gravelled roads ... ..	1,330

55. The average cost of ordinary and special repairs of all but Class I (a) roads has amounted in the past to Rs. 8,37,291. [214]

The average cost of development works has amounted to Rs. 2,68,000. [215]

Deducting the cost of these works from the total of the recurring revenue available, there is a balance of Rs. 17,13,229 per annum, or Rs. 85,66,145 for a five-year period. [216]

56. The average cost of maintenance of the 453 miles of Class I (a) roads with very heavy traffic for five years would be Rs. 6,08,750. [220 ; Proceedings page 26]

If this is deducted from the amount available, there is left a balance of Rs. 79,57,395. [221]

57. The approximate cost of re-surfacing the 453 miles of roads with very heavy traffic—135 miles with tar grouting and 318 miles with tar surfacing only,—is estimated at Rs. 71,26,200. [219]

58. It is hoped that, if the work were taken up on a five-year programme, this cost could be considerably reduced. [222]

59. On this basis there would be ample funds available for dealing with the whole of the 453 miles of road with very heavy traffic as well as for maintaining the remainder of the roads, and there would be a balance of Rs. 8,31,195, or Rs. 1,66,239 per annum, available to meet the expenses of the Road Board and to cover the cost of the Road Traffic Staff. [221]

60. The compensation to District Boards and Municipalities should be based on the average of their collections for the past three years. This calculation to be subject to revision every three years by an independent tribunal. [237]

#### District Board Railways.

61. The advent of motor transport has completely altered the aspect of District Board railway projects. [223]

62. Even the projects already completed need further examination, but the materials for this are not at present available. [224]

63. The funds accumulated for projects that have not yet been undertaken belong to the districts of Kadur, Tumkur and Chitaldrug. [225]

64. A recent survey shows that none of the projects in these districts can possibly be remunerative. [226, 227, 228]

65. The sum accumulated by the Kadur District Board would amply suffice for re-making the Kadur-Chikmagalur road and for putting a fleet of buses on it, whereas it would only pay a part of the cost of a railway which could never be remunerative. [226]

66. The Tumkur and Chitaldrug Districts are the two districts in the State that need roads more than any other. They also need bridges. [230, 231, 232]

67. The obvious conclusion is that the railway cess funds should be expended on a programme of new road works, which might be made remunerative. The collection of the cess should be discontinued except when it is necessary to meet existing obligations. [223]

68. It would even be legitimate to spend part of them on modernising existing roads. [234]

69. If the Railway Department are to run bus services themselves, they might also undertake them on behalf of District Boards. [235]

• Administration.

70. The first essential of the system of the future is co-ordination at all stages. [238, 245, 254]

71. So far as concerns the law and rules, the All-India Act deals with motor offences and registration for purposes of identification. [239]

72. Taxation has become a matter for provincial legislation. [239, 160, 161]

73. In the case of Mysore a new Regulation will be necessary, if the proposed new taxes are approved, as well as some modifications of the Municipal and District Board laws. It will also be well to borrow several provisions of the English Law. [240]

74. In the matter of rules, the draft model rules now under consideration, with possibly slight additions, seem likely to suit the case of Mysore [241 to 244].

75. Now that motor transport has become a factor in the life of the people, an active 'safety first' campaign is necessary. [243]

76. The bicyclist is a great danger, and it might be considered whether he should not be required to take out a license. [243]

77. There should be special provision for enquiry into motor accidents as in the case of railway accidents. [244]

78. It seems probable that an All-India co-ordinating authority will be set up as a result of the Simla Conference. [245]

79. Meanwhile it is very desirable to secure co-ordination and reciprocity between Mysore and its neighbours, Madras and Coorg. [245]

80. In the case of the Civil and Military Station, something more than co-ordination is necessary, and it is suggested that the Residency should be moved to agree to a joint system of administration. [245]

81. The difficulties that have arisen in the past through different interpretations of the same rules indicate the necessity for a co-ordinating authority as between districts. [246]

82. It is also essential that there should be co-ordination as between the road and the railway policy. [247]

83. And between the State Traffic Authority and the authorities responsible for giving the mail contracts. [248]

84. The co-ordinating authority suggested is a Traffic Board consisting of the following members:—

1. The Member of Council in charge (President).
2. The Inspector-General of Police.
3. The Agent, Mysore Railways.
4. The Chief Engineer, P. W. D.
5. The Director of Industries and Commerce.
6. A representative of motor bus companies.
7. A representative of other motor owners.
8. A representative of the agricultural population.
9. A representative of the Chamber of Commerce.
10. The Traffic Manager (Secretary to the Board).

85. The Secretary to the Board should also be a Traffic Manager with a varied list of duties. [254]

He should be assisted in his functions by District Traffic Inspectors, who should have the powers of Inspectors of Police and should work under the direct orders of the Deputy Commissioners. [251, 252]

Under them, again, should be the traffic controlling staff, who should be fewer in number, but of a higher degree of intelligence and training than at present [250].

86. The staff at toll-gates will also be very valuable in connection both with traffic control and with road registration. [249]