

# Pre Registration Inspection for private buses and limousines

**Guidance for Operators**



**GUIDE**

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# Pre Registration Inspection Guidance for Operators

## 1. About this Guide

The Vehicle and Operator Services Agency (VOSA) has produced this guide to explain the Pre Registration Inspection (PRI) for buses and minibuses.

Currently, whilst private cars, light goods vehicles and heavy goods vehicles are subject to an approval process that checks the constructional features of the vehicle before being accepted for registration and first licensing by the Driver and Vehicle Licensing Agency (DVLA), there is no such process for buses and minibuses. Such checks on buses and minibuses are only carried out when the vehicle is intended for use as a Public Service Vehicle and an application is made for a Certificate of Initial Fitness (COIF). Possession of a COIF certificate is not required for registration as a bus or a minibus, but is required if the vehicle is to be licensed in the Public Service Vehicle category.

From October 2010 new European legislation for the approval of motor vehicles requires new buses and minibuses to undergo an approval process before registration. The Pre Registration Inspection will cease on that date for new vehicles, but will continue for earlier vehicles, primarily to ensure that vehicles registered for use on the roads of Great Britain will meet basic constructional requirements. The 'PRI' inspection may also be required by the authorities following registration to confirm that a vehicle continues to comply with current legislation.

Whilst it is acknowledged that most European manufacturers build vehicles to be compliant with EU Directives and regulations which are acceptable in Great Britain, vehicles imported from outside of Europe and vehicles modified following manufacture often do not meet the requirements.

## 2. What does this Guide contain?

This Guide contains advice on:

- ▶ Which vehicles are subject to the PRI,
- ▶ How to arrange a PRI,

- ▶ The PRI standards, and
- ▶ What happens after the PRI.

By referring to this Guide, applicants can check to see if their vehicle will pass the PRI.

## 3. Which vehicles are subject to the PRI?

A PRI is required for all passenger vehicles with more than 8 seating positions, unless they meet the criteria for exemption shown below. Vehicles with 8 or less passenger seating positions require evidence of either European Community Whole Vehicle Type Approval (ECWVTA) or Individual Vehicle Approval (IVA) prior to registration.

The Road Vehicles (Construction and Use) Regulations 1986, as amended, define any passenger carrying vehicle with more than 8 seated passengers as a bus, and any vehicle with more than 8 but not more than 16 seated passengers as a minibus. This is irrespective of the use to which the vehicle will be put.

The following vehicles do not require a PRI for first registration purposes:

- ▶ Vehicles that have been issued with a form of approval certificate i.e. European Community Whole Vehicle Type Approval (ECWVTA), National Small Series Type Approval (NSSTA), Individual Vehicle Approval (IVA), Certificate of Initial Fitness (COIF) or a PSV Type Certification.
- ▶ Vehicles manufactured more than 25 years ago.

**NOTE:** Where a vehicle is considered to have been manufactured more than 25 years ago, evidence of the vehicle age will be required to be verified by the Vehicle and Operator Services Agency (VOSA) who will issue a letter of acceptance for registration purposes.

## 4. How to arrange a PRI

A PRI 1 (Application for a Pre Registration Inspection) form, available from the VOSA website [www.dft.gov.uk/vosa](http://www.dft.gov.uk/vosa), must be completed and sent, along with any supporting documentation, to:

Approvals Section  
VOSA  
Ellipse  
Padley Road  
Swansea  
SA1 8AN

There is **no fee** for the PRI.

The inspection is carried out at selected VOSA Testing Stations, as listed on the PRI 1 application form. Customers are able to indicate their preferred Testing Station when completing the application, however there may be occasions where an alternative Testing Station has to be allocated.

In the Vehicle Weights section of this guide we advise that, where a vehicle has been modified to the extent that the carrying capacity has been increased from the manufacturer's original weights, the application must be supported with evidence of the ability of the vehicle to operate at such increased weights. Where supporting documentation is satisfactory, or none is required, the application form will be forwarded to the preferred Testing Station for their staff to make an appointment with the applicant. Applicants should allow approximately one hour for the inspection to take place.

There is no exemption from the requirement to register the vehicle with the DVLA and display the registration mark before driving the vehicle on a road for the PRI appointment. Unless vehicles display trade plates (trade plates may only be used for the business purpose for which they were originally issued) an alternative way to transport the vehicle will have to be found.

## 5. PRI standards

The inspection does not cover every regulation regarding the construction of the vehicle. It covers basic items which enable a decision to be made regarding whether the vehicle is acceptable for registration. It is the owner's responsibility to ensure that the vehicle complies with all relevant regulations at all times.

Most standards are contained in The Road Vehicles (Construction and Use) Regulations 1986, as amended, and The Road Vehicles Lighting Regulations 1989, as amended. Some EU Directives are also referred to.

During the PRI, basic checks will be conducted on the following:

- ▶ Vehicle dimensions,
- ▶ Markings and plates,
- ▶ Vehicle weights,
- ▶ Tyres,
- ▶ Glazing,
- ▶ Lamps and reflectors,
- ▶ Mirrors,
- ▶ Fuel tanks and exhaust tailpipes,
- ▶ Speed limiters,
- ▶ Seats (including seat belts),
- ▶ Door locks and grab handles,
- ▶ Doors,
- ▶ Fire extinguishers and first aid kits,
- ▶ Turning circle, and
- ▶ Braking systems.

### 5.1 Vehicle dimensions

Regulation 7 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, gives the maximum length of a bus with two axles as 13.5 metres, and with more than two axles as 15 metres. Regulation 8 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, gives the maximum width of a vehicle as 2.55 metres.

The dimensions of some vehicles will be clearly within the stated maximums. In cases of doubt, the vehicle will be measured by identifying the extreme points on the vehicle and transferring these points to the floor by

means of a plumb bob. The floor will be marked and the distances between the marks will be measured.

In relation to the maximum length, any receptacle which is of a permanent character, and accordingly strong enough for repeated use, will be included. Also any fitting on or attached to the vehicle, except for any driving mirror, will be included. Any rearward projecting buffer made of rubber or other resilient material will be excluded.

In relation to the maximum width, any receptacle which is of a permanent character, and accordingly strong enough for repeated use, will be included. Also any fitting on or attached to the vehicle, except for any driving mirror, lamp or reflector fitted to the vehicle in accordance with the lighting regulations, will be included. Distortion of any tyre caused by the weight of the vehicle will be excluded.

## 5.2 Markings and plates

Regulation 71 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, requires the unladen weight of a bus to be plainly marked in a conspicuous place on the outside of the vehicle at the nearside.

As a guide, the marking should be approximately 25 mm high and be marked in a contrasting colour to the background. An example of the marking might be "ULW 4,500 Kgs".

Regulation 66 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, requires buses first used on or after 1st April 1982 to have a plate containing important details regarding the vehicle, which is securely attached in a conspicuous and readily accessible position.

This plate is known generally as a "manufacturer's plate". It must be made of a durable material and the markings must be indelible. Traditionally such plates are made of metal, with the required details stamped or etched into them, and riveted to the vehicle.

Whilst there may be modern alternatives to this, they must still meet the requirement for durability and have indelible markings. The details required on the plate are:

- ▶ the manufacturers name,
- ▶ the Vehicle Identification Number,
- ▶ the maximum permitted laden weight for each axle, and
- ▶ the maximum permitted laden weight for the vehicle.

The weights referred to above are the weights allocated by the manufacturer when the vehicle is manufactured. These will be calculated as part of the design process for the vehicle (for further information please see the Vehicle weights section below).

## 5.3 Vehicle weights

The checks on this item are separated into two parts. The first part is a check that, when fully laden with passengers, the vehicle will not exceed the maximum permitted weights (those referred to in the Markings and plates section above) for the individual axles and the vehicle as a whole.

The examiner will calculate the laden weight of the vehicle by multiplying the number of seating positions (including the driver) by 75 kgs and adding this figure to the unladen weight of the vehicle. The examiner will calculate the laden weight of each axle by measuring the seating positions in relation to the axles and then taking moments around the axles using a figure of 68 kgs for each seating position. The examiner will also take moments around the axles using the centre of the luggage space and a figure of 7 kgs per seating position to take account of notional luggage weight (the 68 kgs + 7 kgs making up the overall 75 kgs per seating position).

Applicants may be required to bring evidence to the inspection of the unladen weight of the vehicle, measured at each axle, in the form of a weighbridge ticket.

The second part of this item deals with vehicles that have been altered from the manufacturer's original specification.

When a manufacturer designs a vehicle they allocate the maximum weights at which the vehicle can operate. If a vehicle is subsequently altered from the original specification VOSA needs to be satisfied that the vehicle, in its modified state, either does not exceed the manufacturer's original maximum operating weights or, if it does, that the vehicle is capable of operating at any increased axle or gross (vehicle) weight nominated.

The onus is on the applicant to demonstrate the ability of the vehicle to operate at any increased weight. Documentary evidence will be required to show what steps the converter has taken to ensure that the vehicle can operate at any increased weight. This will typically involve providing specifications of any replacement components to show that they are suitable for the higher weights, and how they are identified; providing engineering reports and calculations for areas affected by the conversion, along with other relevant information.

The above information is required as VOSA is not able to conduct any relevant tests to determine the maximum operating weights of a vehicle. As stated previously, these are calculated as part of the design process therefore VOSA needs to be satisfied that any conversion process has taken this into account. Any supporting documentation must be included with the application.

## 5.4 Tyres

Regulation 25 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, relates to tyre loads and speed ratings. This regulation also refers to ECE Regulations 30 and 54, to the requirement that tyres for buses are "E" or "e" marked to denote that the tyre is manufactured to the European standard. This marking will be on the sidewall of the tyre, placed there by the manufacturer.

The tyre must be suitable to be used at the vehicle's prescribed maximum speed. For a vehicle up to 12 metres in length this is 70 mph, and for a vehicle over 12 metres in length this is 60 mph. Tyres are marked with their speed rating on the sidewall by the manufacturer using a letter which is adjacent to the Load Index. For example "146/143J", the "J" rating being acceptable for speeds up to 62 mph.

The examiner will use the following table to determine the required speed rating for a tyre.

Speed category symbol	Corresponding speed	
	mph	kph
C	37	60
D	40	65
E	43	70
F	50	80
G	56	90
J	62	100
K	68	110
L	74	120
M	81	130
N	87	140
P	93	150
Q	99	160
R	106	170
S	112	180

Tyres must also be marked with the load they can carry. To do this a Load Index is used. The following table shows common load indices.

Load Index	Single kg	Dual kg	Load Index	Single kg	Dual kg	Load Index	Single kg	Dual kg
70	670	1340	107	1950	3900	144	5600	11200
71	690	1380	108	2000	4000	145	5800	11600
72	710	1420	109	2060	4120	146	6000	12000
73	730	1460	110	2120	4240	147	6150	12300
74	750	1500	111	2180	4360	148	6300	12600
75	774	1548	112	2240	4480	149	6500	13000
76	800	1600	113	2300	4600	150	6700	13400
77	824	1648	114	2360	4720	151	6900	13800
78	850	1700	115	2430	4860	152	7100	14200
79	874	1748	116	2500	5000	153	7300	14600
80	900	1800	117	2570	5140	154	7500	15000
81	924	1848	118	2640	5280	155	7750	15500
82	950	1900	119	2720	5440	156	8000	16000
83	974	1948	120	2800	5600	157	8250	16500
84	1000	2000	121	2900	5800	158	8500	17000
85	1030	2060	122	3000	6000	159	8750	17500
86	1060	2120	123	3100	6200	160	9000	18000
87	1090	2180	124	3200	6400	161	9250	18500
88	1120	2240	125	3300	6600	162	9500	19000
89	1160	2320	126	3400	6800	163	9750	19500
90	1200	2400	127	3500	7000	164	10000	20000
91	1230	2460	128	3600	7200	165	10300	20600
92	1260	2520	129	3700	7400	166	10600	21200
93	1300	2600	130	3800	7600	167	10900	21800
94	1340	2680	131	3900	7800	168	11200	22400
95	1380	2760	132	4000	8000	169	11600	23200
96	1420	2840	133	4120	8240	170	12000	24000
97	1460	2920	134	4240	8480	171	12300	24600
98	1500	3000	135	4360	8720	172	12600	25200
99	1550	3100	136	4480	8960	173	13000	26000
100	1600	3200	137	4600	9200	174	13400	26800
101	1650	3300	138	4720	9440	175	13800	27600
102	1700	3400	139	4860	9720	176	14200	28400
103	1750	3500	140	5000	10000	177	14600	29200
104	1800	3600	141	5150	10300	178	15000	30000
105	1850	3700	142	5300	10600	179	15500	31000
106	1900	3800	143	5450	10900			

Each Load Index shows the permissible weight when used as a single tyre and also when used in twin formation. The Load Index may consist of one number, e.g. 154 which shows that as a single tyre the permissible weight is 7500 kgs. Where one number is used as a Load Index on a tyre the



## 5.5 Glazing

Regulation 32 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, relates to glass in motor vehicles. This regulation states that, for vehicles first used after 1st June 1978, windscreens and other windows wholly or partly on either side of the driver's seat must be made of specified safety glass. This will include roof lights made of glass.

Such safety glass must be marked with either:

- ▶ BS 857,
- ▶ BS 857/2,
- ▶ BS AU 178, or
- ▶ a European Approval "E" or "e" marking to Regulation 43.

The examiner will inspect each piece of glass to ensure that the glass is marked accordingly by the manufacturer.

For vehicles first used before 1st April 1985, all windscreens and windows wholly or partly on either side of the driver's seat must have a visual light transmission of at least 70%. For vehicles first used on or after 1st April 1985, the transmission of light through the windscreen must be at least 75%. Similarly, all windows that form part or all of a door, giving access to or from the exterior of the vehicle, must have a light transmission of at least 70%.

The examiner may use an opacity meter to measure the light transmission where there is doubt regarding the ability of the glass to meet this requirement. It is unlikely that windows treated with a tinted film will be able to comply with this requirement.

## 5.6 Lamps and reflectors

The Road Vehicles Lighting Regulations 1989, as amended, cover the lighting aspects of motor vehicles. These stipulate that all obligatory lamps (those required by regulations) and rear reflectors must display a manufacturer's European Approval "E" or "e" marking, applied at the time of manufacture.

The table on page 10 shows the obligatory lamps (the position of the lamps is not part of the inspection but the information is provided for guidance).

Additionally, for minibuses, Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states that *"every minibus shall be provided with lamps to illuminate every step at a passenger exit or in a gangway"*. This is to ensure that passengers are not put at risk by moving around inside the vehicle, or when entering or leaving the vehicle, in darkness. Sometimes the requirement for a step light may be fulfilled by the normal saloon interior lamps, although often a separate step light will be required so that passengers can enter and exit the vehicle in the dark safely.

Type / Application	Number	Application date	Colour	Approval mark "E" or "e" and identity symbol	Position		
					Maximum distance from side (mm)	Maximum height (mm)	Minimum height (mm)
Front position lamps	Two	All vehicles	White; or yellow if in a yellow headlamp	A	400	No requirement	No requirement
Dipped beam headlamps	Two	From 1st Jan 1931	White or yellow	C (S – sealed beam, H – halogen)	400	1200	500
Main beam headlamps	Two	From 1st Jan 1931	White or yellow	R (S – sealed beam, H – halogen)	No closer to the side of the vehicle than the dipped beam lamp	No requirement	No requirement
Front end outline marker lamps	Two	From 1st April 1991 where width is more than 2100mm	White	A	400	No requirement	The top of the lamp shall be no lower than the top of the windscreen
Rear end outline marker lamps	Two	From 1st April 1991 where width is more than 2100mm	Red	R	400	No requirement	As high as possible with regard to the lateral position, being a pair and the use for which the vehicle is constructed
Rear position lamps	Two	All vehicles	Red	R	400	1500 or if impracticable 2100	350
Stop lamps	Two	From 1st Jan 1936	Red	S1 or S2	One on each side with a minimum separation distance of 400	1500 or if impracticable 2100	350
Rear registration plate lamp	Such that adequate illumination is provided	All vehicles requiring a registration plate	White	L	Such that the lamp or lamps are capable of illuminating the rear registration plate	Such that the lamp or lamps are capable of illuminating the rear registration plate	Such that the lamp or lamps are capable of illuminating the rear registration plate
Rear fog lamps	One	From 1st April 1980 where width is more than 1300mm	Red	B or F	On centre line or to offside of vehicle (min separation distance from stop lamp 100)	1000	250
Direction indicators	One each side Front: one Rear: one Side repeater: one	From 1st Jan 1936	Amber	From 1/4/86 Front: 1, 1a, 1b Front-side: 3 or 4 Side repeater: 5 Rear: 2, 2a, 2b	400 (min separation distance 500)	1500 or if impracticable 2300	350
Rear retro reflectors (cannot be triangular)	Two	All vehicles	Red	I or IA	400 (min separation distance 600)	900 or if impracticable 1200	250

## 5.7 Mirrors

Regulation 33 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, relates to the mirrors required to be fitted to vehicles. A main external mirror must be fitted to the off side and to the near side of the vehicle.

Additionally, minibuses must be fitted with mirrors or other means that enable the driver, when seated in the driver's seat, to clearly see the area immediately inside and outside every service door (normal entrance and exit for passengers) of the vehicle. For a service door on the near side of the vehicle the normal near side external mirror may satisfy this requirement.

In the case of a rear service door this shall be satisfied if a person 1.3 metres tall, standing 1 metre behind the vehicle, is visible to the driver when occupying the driver's seat. This will normally require an internal rear view mirror to be fitted.

## 5.8 Fuel tanks and exhaust tailpipes

Item 11 in Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states *"No minibus shall be fitted with a fuel tank or any apparatus for the supply of fuel which is in the compartments or other spaces provided for the accommodation of the driver or passengers"*.

The examiner will check that no fuel tanks are fitted in the passenger or driver compartments of a minibus.

Item 1 in Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states *"The outlet of every exhaust pipe fitted to a minibus shall be either at the rear or on the off side of the vehicle."*

This is to ensure that exhaust gases are not vented to the atmosphere beneath the vehicle, where they could be drawn back into the interior, and also to prevent exhaust fumes being directed toward the pavement. The examiner will check this item.

## 5.9 Speed limiters

Regulation 36A of The Road Vehicles (Construction and Use) Regulations 1986, as amended, covers the fitment of speed limiters to certain vehicles.

Vehicles requiring speed limiter fitment are shown below:

- A.** A vehicle first used from 1st April 1974 until 31st December 1987 with:
  - ▶ more than 16 seats, and
  - ▶ a design gross weight of more than 7500 kg, and
  - ▶ a maximum speed capability exceeding 70 mph (112.65 kph), if a speed limiter were not fitted,must be fitted with a speed limiter set at a maximum of 70 mph (112.65 kph).
- B.** A vehicle first used from 1st January 1988 until 30th September 2001 with:
  - ▶ more than 8 passenger seats, and
  - ▶ a design gross weight of more than 7500 kg and less than 10001 kg, and
  - ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,must be fitted with a speed limiter set at a maximum of 100 kph (62.14 mph).
- C.** A vehicle first used from 1st October 2001 with:
  - ▶ more than 8 passenger seats, and
  - ▶ a design gross weight of more than 7500 kg and less than 10001 kg, and
  - ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,must be fitted with a speed limiter set at a maximum of 100 kph (62.14 mph).
- D.** A vehicle first used from 1st January 1988 until 31st December 2004 with:
  - ▶ more than 8 passenger seats, and
  - ▶ a design gross weight of more than 10000 kg, and
  - ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,must be fitted with a speed limiter set at a maximum of 100 kph (62.14 mph).

**E.** A vehicle first used between 1st October 2001 and 31st December 2004 with a Euro 3 diesel or gas engine (see note below) and with:

- ▶ more than 8 passenger seats, and
- ▶ a design gross weight of less than 7501 kg, and
- ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,

must be fitted with a speed limiter set at a maximum stabilised speed of 100 kph (62.14 mph) from 1st January 2007, or from 1st January 2006 if used in International traffic.

**F.** A vehicle first used from 1st January 2005 with:

- ▶ more than 8 passenger seats, and
- ▶ a design gross weight up to 5000 kg, and
- ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,

must be fitted with a speed limiter set at a maximum stabilised speed of 100 kph (62.14 mph) from 1st January 2008, or from 1st January 2005 if used in International traffic.

**G.** A vehicle first used from 1st January 2005 with:

- ▶ more than 8 passenger seats, and
- ▶ a design gross weight from 5001 kg to 7500 kg, and
- ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,

must be fitted with a speed limiter set at a maximum stabilised speed of 100 kph (62.14 mph) from 1st January 2005.

**H.** A vehicle first used from 1st January 2005 with:

- ▶ more than 8 passenger seats, and
- ▶ a design gross weight in excess of 10000 kg, and
- ▶ a maximum speed capability exceeding 100 kph (62.14 mph), if a speed limiter were not fitted,

must be fitted with a speed limiter set at a maximum stabilised speed of 100 kph (62.14 mph) from 1st January 2005.

**Note :** Some vehicles first used from 1st October 2001 until 31st December 2004 may have been approved to Directive 70/220 EC or fitted with Euro 2 engines. These vehicles are exempt from the speed limiter fitting requirements for Group E. Where exemption is claimed at time of test this should be accompanied by an operator's declaration of exemption and, where necessary, supported by the manufacturer's confirmation of emission test standard. The following listed vehicles have already been confirmed by their manufacturers as being exempt and no further evidence is required:

- ▶ Any vehicles with a petrol engine or petrol engine converted to run on LPG,
- ▶ Citroen Relays with 2.0 litre and 2.2 litre HDi engines,
- ▶ DAF 45 7.5 ton vehicles (except DAF 45 marked as LF (LF is marked on the N/S of the radiator grill)),
- ▶ Fiat Ducatos with 2.0 litre engines (engine code RHV),
- ▶ Ford Transits (all),
- ▶ Isuzu models NPR, NQR with T, V, W, X or 1 (one) as the 10th VIN character,
- ▶ Iveco Cargos (except vehicles with engine code F4AE---),
- ▶ Iveco Dailys (except vehicles with engine codes F1CE---, 8140.43B, 8140.43N and 8140.43S with PIC code "G" (the PIC code is applicable to the 8140.43S only and can be found on the ID plate on the shut panel for the bonnet, identified by the third character)),
- ▶ LDVs (all),
- ▶ Mitsubishi Canters with "R" as the 12th VIN character,
- ▶ Nissan Interstars (except vehicles with engine codes ZD3-A202, G9U-A754, S9W-A702 & G9U-A724),
- ▶ Nissan Primastars (all),
- ▶ Peugeot Boxers with 2.0 litre and 2.2 litre HDi engines,
- ▶ Renault Masters (except vehicles with engine codes ZD3-A202, G9U-A754, S9W-A702 & G9U-A724),
- ▶ Renault Traffics (all),
- ▶ Vauxhall / Opel Movanos with E, F, G, J, K, L, M, N, P, T or W as the 7th VIN character,

- ▶ Vauxhall / Opel Vivaros (all),
- ▶ Volkswagens (except 2.5 litre / 2.8 litre 109 bhp / 158 bhp engine codes AVR & AUH respectively).

Applicants should use the above information to check whether their vehicle requires the fitment of a speed limiter. Vehicles that do require the fitment of a speed limiter are also required by Regulation 70A of The Road Vehicles (Construction and Use) Regulations 1986, as amended, to have a plate fitted in the driving compartment which is clearly and indelibly marked with the speed at which the speed limiter has been set by the authorised body. The speed may be shown in mph or kph.

### 5.10 Seats (including seat belts)

For a minibus, Item 9 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, relates specifically to seats. Every seat and every wheelchair anchorage must be fixed to the vehicle.

The general requirements of The Road Vehicles (Construction and Use) Regulations 1986, as amended, are that vehicles be maintained so as not to cause a danger. The seat security of a bus is covered by this and it is therefore essential that all seats are securely fixed to the vehicle.

Wheelchair anchorages which would cause the wheelchair to face sideways must not be fitted. Any seat which faces sideways and is fitted in front of a rear door must have a device to guard against its passenger falling through the doorway. This would normally take the form of an arm rest to prevent the passenger sliding sideways in the seat. Similarly, no seat may be placed so that a passenger would, without protection, be liable to be thrown out of an exit equipped with a power door. Therefore, any seat adjacent to an exit with a power door requires some form of protection to prevent a passenger from being thrown out of the exit. Again, this would normally take the form of an arm rest to prevent the passenger sliding sideways in the seat.

For minibuses there are added requirements in that no seat (except a wheelchair) shall measure less than 400 mm in width. Vehicles first used from 1st October 1998 must be equipped with seat belts on all forward facing seats, and vehicles first used from 1st October 2001 must also be equipped with seat belts on rearward facing seats.

### 5.11 Door locks and grab handles

Paragraph 5 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

*“No minibus shall be fitted with-*

- a door which can be locked from the outside unless, when so locked, it is capable of being opened from inside the vehicle when stationary;*
- a handle or other device for opening any door, other than the driver’s door, from inside the vehicle unless the handle or other device is designed so as to prevent, so far as is reasonably practicable, the accidental opening of the door, and is fitted with a guard or transparent cover or so designed that it must be raised to open the door;*
- a door which is not capable of being opened, when not locked, from inside and outside the vehicle by a single movement of the handle or other device for opening the door.”*

The examiner will therefore inspect a minibus to ensure that:

- ▶ All doors are capable of being opened, when not locked, from inside and outside the vehicle by a single movement of the handle or other device for opening the door (“c” above).
- ▶ All doors, capable of being locked from the outside, are capable of being opened from the inside when so locked, when the vehicle is stationary (“a” above). This is to prevent passengers from being locked inside the vehicle.
- ▶ A door handle for opening any door (except the driver’s door) from the inside is designed to prevent, so far as is reasonably practical, the accidental opening of the door. If the handle is not

so designed it must be fitted with a cover that has to be raised to gain access to the handle.

Paragraph 8 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states *“Every minibus shall be fitted as respects every side service door with a grab handle or a hand rail to assist passengers to get on or off the vehicle.”*

Therefore, all minibuses will be inspected to ensure that side doors used by passengers to enter or exit the vehicle have a suitable grab handle or hand rail fitted.

## 5.12 Doors

Paragraph 2.1 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

*“Every minibus shall be fitted with at least-*

- (a) one service door on the near side of the vehicle; and*
- (b) one emergency door either at the rear or on the off side of the vehicle so, however, that any emergency door fitted on the off side of the vehicle shall be in addition to the driver’s door and there shall be no requirement for an emergency door on a minibus if it has a service door at the rear in addition to the service door on the near side.”*

This means that every minibus must have an entrance/exit on the near side of the vehicle for normal “service” use. There must also be a door for emergency use in the rear face of the vehicle or on the off side. Any emergency door fitted to the off side must be in addition to the driver’s door. If, however, the vehicle has an additional normal “service” door in the rear face of the vehicle, this will fulfil the requirement for an emergency exit.

Paragraph 2.2 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states *“No minibus shall be fitted with any door on its off side other than a driver’s door and an emergency door.”*

The obvious thinking behind the requirement is that passengers will not exit the vehicle

from the off side, which would be dangerous, unless in an emergency. On a left hand drive limousine type vehicle the off side front door, opposite the driver, may be deemed to be a drivers door. This door will not be acceptable as an emergency exit for passengers in the rear saloon compartment unless there is free access to it. Minibuses will be checked for this requirement.

Paragraph 3 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

*“Every emergency door fitted to a minibus, whether or not required pursuant to these Regulations, shall-*

- (a) be clearly marked, in letters not less than 25 mm high, on both the inside and the outside, “EMERGENCY DOOR” or “FOR EMERGENCY USE ONLY”, and the means of its operation shall be clearly indicated on or near the door;*
- (b) if hinged, open outwards;*
- (c) be capable of being operated manually; and*
- (d) when fully opened, give an aperture in the body of the vehicle not less than 1210 mm high nor less than 530 mm wide.”*

All minibuses will be checked to ensure these requirements are met. The “means of operation” may be defined as wording to show how to open the door. An example might be “To Open, Pull Lever” with an arrow indicating the direction to pull the lever. This is to assist anyone trying to open the door in an emergency situation by avoiding confusion as to how to open the door.

The dimensions for the emergency exit are for the aperture in the body, not the door. The easiest way to check this is to cut a rectangular template, made of a rigid but light material, to the dimensions required and check whether this will pass through the aperture in the body.

Paragraph 7 of Schedule 6 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

- “(1) Save as provided in sub-paragraph (2), there shall be unobstructed access*

from every passenger seat in a minibus to at least two doors one of which must be on the nearside of the vehicle and one of which must be either at the rear or on the offside of the vehicle.

- (2) Access to one only of the doors referred to in sub-paragraph (1) may be obstructed by either or both of-
- (a) a seat which when tilted or folded does not obstruct access to that door; and
  - (b) a lifting platform or ramp which-
    - (i) does not obstruct the handle or other device on the inside for opening the door with which the platform or ramp is associated, and
    - (ii) when the door is open, can be pushed or pulled out of the way from the inside so as to leave the doorway clear for use in an emergency.”

Every minibus will be checked to ensure this requirement is met.

### 5.13 Fire extinguishers and first aid kits

Regulation 42 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

- “(1) No person shall use, or cause or permit to be used, on a road a minibus first used on or after 1st April 1988 unless it carries suitable and efficient apparatus for extinguishing fire which is of a type specified in Part I of Schedule 7.
- (2) The apparatus referred to in paragraph (1) above shall be-
- (a) readily available for use;
  - (b) clearly marked with the appropriate British Standards Institution specification number; and
  - (c) maintained in good and efficient working order.”

Part I of schedule 7 states:

“Fire Extinguishing Apparatus and First Aid Equipment for Minibuses

[Part I

Fire Extinguishing Apparatus (see regulation 42)

A fire extinguisher which complies in all respects with the specification for portable fire extinguishers issued by the British Standards Institution numbered BS 5423: 1977 or BS 5423: 1980 or BS 5423: 1987 and which-

- (a) has a minimum test fire rating of 8A or 21B, and
- (b) contains water or foam or contains, and is marked to indicate that it contains, halon 1211, or halon 1301].”

**It should be noted, however, that Halon is now a banned substance and fire extinguishers may no longer contain this.**

The examiner will check every minibus to ensure that an appropriate fire extinguisher is carried. Fire extinguishers are marked with the BS number, fire rating and contents so applicants can easily check their own. The European standard EN3 is an acceptable alternative marking to the British Standard marking.

Regulation 43 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

- “(1) No person shall use, or cause or permit to be used, on a road a minibus first used on or after 1st April 1988 unless it carries a receptacle which contains the items specified in Part II of Schedule 7.”

Part II of Schedule 7 lists:

“First Aid Equipment (see regulation 43):

- (i) Ten antiseptic wipes, foil packed;
- (ii) One conforming disposable bandage (not less than 7.5 cm wide);
- (iii) Two triangular bandages;
- (iv) One packet of 24 assorted adhesive dressings;
- (v) Three large sterile unmedicated ambulance dressings (not less than 15.0 cm x 20.0 cm);
- (vi) Two sterile eye pads, with attachments;
- (vii) Twelve assorted safety pins; and
- (viii) One pair of rustless blunt-ended scissors.”

The examiner will check that every minibus carries a first aid box containing the required items.

## 5.14 Turning Circle

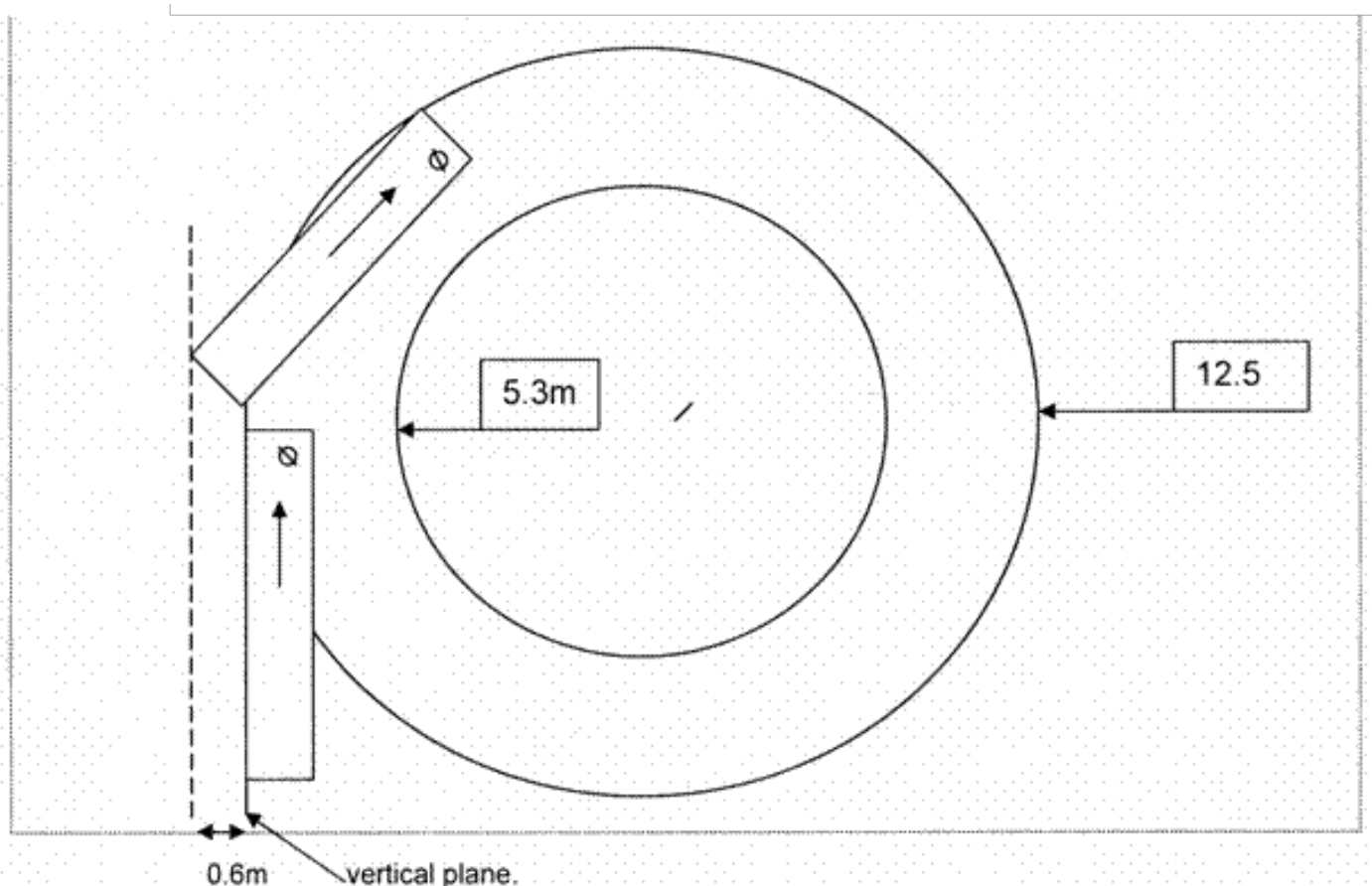
Regulation 13 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, states:

- (1) *This regulation applies to a bus first used on or after 1st April 1982.*
- (2) *Every vehicle to which this regulation applies shall be able to move on either lock so that, both with and without all its wheels in contact with the ground, no part of it projects outside the area contained between concentric circles with radii of 12.5 m and 5.3 m.*
- (2A) *In relation to a vehicle manufactured before 1st June 1998 paragraph (2) shall have effect as if the words “, both with and without all its wheels in contact with the ground,” were omitted.*
- (3) *When a vehicle to which this regulation applies moves forward from rest, on either lock, so that its outermost point describes a circle of 12.5 m radius, no part of the vehicle shall project beyond the longitudinal plane*

*which, at the beginning of the manoeuvre, defines the overall width of the vehicle on the side opposite to the direction in which it is turning by more than-*

- (a) *0.8 m if it is a rigid vehicle of 12m or less in overall length; or*
  - (b) *1.2 m if it is a rigid bus of over 12m in overall length or an articulated bus.*
- (4) *For the purpose of paragraph (3) the two rigid portions of an articulated bus shall be in line at the beginning of the manoeuvre.”*

This regulation deals with the manoeuvrability of a bus and describes the method of testing as the ability of the vehicle to stay within two circles drawn on the ground. However, buses registered from 9th March 2005 have to meet the turning circle requirements of EU Directive 96/53 which effectively reduces the measurement at 3a above to 0.6 m. This is shown in the following diagram.



The vehicle must be capable of keeping within the prescribed circles except for the rear of the vehicle where up to 0.6 m outswing is permissible.

Alternatively, this requirement may be checked using calculations. This method would involve measuring the angles which the wheels turn through when the steering is turned on a full lock, and then using vehicle dimensions to calculate the turning circle requirement.

## 5.15 Braking systems

Regulation 15 of The Road Vehicles (Construction and Use) Regulations 1986, as amended, deals with braking systems on vehicles and points to the construction, fitting and performance requirements contained in European Directives.

These are too large to reproduce here however, for buses and minibuses, the Directive requires, amongst other things, that the vehicle is fitted with:

1. A service braking system capable of being operated on all wheels by a single means of operation with a minimum efficiency of at least 50%.
2. A secondary braking system capable of operating via either half of a split circuit service brake system on at least two wheels (one on each side) in the event of failure of the service brake or its power assistance with a minimum efficiency of at least 25%.
3. A parking brake system capable of being operated:
  - I. easily by the driver from the driving position,
  - II. whether the vehicle is stationary or moving (it must be possible to apply and release the brake while the vehicle is moving),
  - III. on all the wheels of a least one axle enabling the vehicle to be held on an up or down gradient with an efficiency of at least 16%, and
  - IV. using a control which is independent of the service brake and capable, once applied, of being

maintained in the 'on' position solely by a mechanical means.

Brake efficiency is the total retarding force expressed as a percentage of the gross vehicle weight. This is the maximum permissible operating weight and appears on the vehicle manufacturer's plate discussed earlier.

The vehicle braking systems will be tested to the performance limits stated, along with checks for any malfunctioning brake. Such brake tests may be carried out on a roller brake tester or by using a decelerometer placed in the vehicle and the brakes applied at approximately 20 mph.

## **6. What happens after the PRI?**

If the vehicle is found to meet the requirements VOSA will issue a certificate which the DVLA will accept as evidence, subject to any verification checks they may wish to make with VOSA, that the vehicle has passed the inspection. Applicants may then proceed to apply for registration and first licensing of the vehicle at a DVLA Local Office.

If the vehicle fails to meet the requirements, VOSA will issue a document explaining the reasons why the vehicle is considered not to comply. The vehicle can be retested if, and when, the items of non compliance have been rectified by contacting the Testing Station that conducted the initial examination.

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