

LICENSING COMMITTEE	AGENDA ITEM No. 4
29 JULY 2013	PUBLIC REPORT

Cabinet Member(s) responsible:	Councillor Marco Cereste – Leader of the Council and Cabinet Member for Growth, Strategic Planning, Housing, Economic Development and Business Engagement	
Contact Officer(s):	Adrian Day - Licensing Manager Peter Gell - Strategic Regulatory Services Manager	Tel. 454437 Tel. 453429

CHANGES IN THE LICENSING POLICY FOR HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE LICENSING

OPTIONS	
FROM : The Licensing Team Licensing Manager Adrian Day	Deadline date : n/a
<p>The Committee is requested to approve one of the following options:</p> <ol style="list-style-type: none"> 1. To amend the councils existing conditions of fitness for Hackney Carriage Vehicles so that the Peugeot E7 range meets the criteria to be licensed as a Hackney Carriage Vehicle. Creating the “Peterborough Condition of Fitness of Hackney Carriage Vehicles”; 2. To amend the Councils existing conditions of fitness for Hackney Carriage Vehicles so that specific models of the Peugeot E7 meets the criteria to be licensed as a Hackney Carriage Vehicle. Creating the “Peterborough Conditions of Fitness of Hackney Carriage Vehicles”; or 3. To retain the Councils existing conditions of fitness for Hackney Carriage Vehicles; where only vehicle types currently approved as suitable to be licensed as a Hackney Carriage Vehicles will be licensed. 	

1. ORIGIN OF REPORT

- 1.1 This report is of a result of officers receiving a request from Allied Vehicles Ltd for the Council to review its conditions of fitness in relation to Hackney Carriage Vehicles. The request is to amend the Council’s current criteria in order for the Peugeot E7 to be considered as suitable to be licensed as a Hackney Carriage Vehicle.
- 1.2 There is a need for officers to review the Taxi and Private Hire Licensing Policy in order to ensure that it remains appropriate and fit for purpose.

2. PURPOSE AND REASON FOR REPORT

- 2.1 Following the approval from the licensing committee on 21st January 2013, a 12 week consultation in relation to the Hackney Carriage and Private Hire Vehicle Licensing Policy a full consultation was launched. The consultation was launched on 1st February 2013 with an end date of 25th April 2013.

- 2.2 The purpose of the consultation was to seek responses from all stakeholders who have an interest in or may be affected by the Hackney Carriage and Private Hire Policy. A copy of the consultation document is attached at **Appendix A** [taxi consultation document final]
- 2.3 A list of consultee's can be found at **Appendix B**.
- 2.4 It should be noted that although the consultation covered many areas of Taxi and Private Hire Licensing for the purposes of this report the licensing committee are asked to consider only the conditions of fitness for Hackney Carriage Vehicles. Therefore only responses relating to this area have been included. The remaining areas of the consultation will be included on a further report to the committee at a later date.
- 2.5 It is essential that all policies are current and fit for purpose in order for any regulation to be effective. Therefore it is good practice to review policies on a regular basis in order for any policy to be appropriate and up to date and fit for purpose.
- 2.6 Following the committee's decision the outcome will form part of the Peterborough City Council's Taxi and Private Hire Licensing Policy and Guidance document.
- 2.7 This report is for the Committee to consider under its Terms of Reference No. 2.4.1.3 (a) "To exercise the functions of the authority as listed in Schedule 2.4.4, where these are not delegated to officers as listed at section 2.4.3, namely", "hackney carriage and private hire vehicle licensing".

3. TIMESCALE

Is this a Major Policy Item /Statutory Plan?	No
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4. BACKGROUND INFORMATION

- 4.1 All councils have different policies in relation to Hackney Carriage and Private Hire Vehicles in order to regulate the service in accordance with local requirements. A policy which is deemed appropriate in one locality may not meet the requirements or expectations within another locality.
- 4.2 It is good practice to review all policies from time to time in order to ensure that the policy adopted remains fit for purpose, takes in to account any changes in legislation, or to consider any other factors that may have an affect on the service to which the policy relates.
- 4.3 Peterborough City Council has various individual policies relating to Taxi and Private Hire Licensing many of which have remained unchanged for many years. Some of the aspects of licensing have been reviewed recently such as the vehicle age policy and the testing requirements for new driver applications.
- 4.4 Officers received a request from Allied Vehicles Ltd to review its policy in relation to the conditions of fitness for hackney carriage vehicles in order for the Peugeot E7 to be considered as suitable and fit for purpose to be licensed as a hackney carriage vehicle in Peterborough. Currently the E7 can be licensed as a private hire vehicle; however it does not meet the specification set by Transport for London Conditions. These are the conditions adopted previously by the council as being the appropriate criteria for hackney carriage vehicles in Peterborough.
- 4.5 The council's adopted policy only approves London type taxi vehicles approved by the Transport for London's Condition of Fitness, formally known as the Public Carriage Office (PCO) and suitably equipped with wheelchair facility ramps and securing straps; these vehicles being the LTI TX1, TX2, TX4, the Metro Triple T and the steering rear axle Mercedes-Benz Vito.

- 4.6 Within the UK there are 374 licensing authorities, out of which 367 already licence the E7 as a Hackney Carriage vehicle. Peterborough City Council is one of the 7 authorities who do not allow the E7 to be licensed as a Hackney Carriage vehicle; however it can be licensed as a private hire vehicle.

5. RELEVANT CONDITIONS OF FITNESS FOR CONSULTATION

- 5.1 Existing Hackney Carriage Vehicle requirements are such that in order for a vehicle to be licensed as a Hackney Carriage it has to be of an approved type. The council's adopted policy only approves London type taxi vehicles which meet the Transport for London conditions of Fitness and suitably equipped with wheelchair facility ramps and securing straps.
- 5.2 Vehicles that are currently approved as licensable as Hackney Carriage Vehicles are as follows; the LTI TX1, TX2, TX4, the Metro Triple T, and the steering rear axel Mercedes-Benz Vito. Vehicles must be new or a maximum of 3 years old at the time of first being licensed.
- 5.3 The Mercedes-Benz Vito has a rear steer axel mechanism which allows it to meet the current turning circle requirement. There has been some reports that the mechanism is prone to failure and that some drivers do not engage the system. There are currently 9 Mercedes-Benz Vito's licensed in Peterborough as Hackney Carriage vehicles.
- 5.4 The Peugeot E7 does not currently meet all of the conditions required as set out by the TFL (Transport for London) as adopted by Peterborough City Council. Where these conditions are not met the committee is requested to consider amending the conditions in order for the E7 range or specific models from the range to be considered as suitable for licensing as a Hackney Carriage Vehicle in Peterborough.
- 5.5 The committee is asked to consider the responses from the consultation, including any information provided by speakers at the meeting in order to determine if the amending of the said conditions will cause any safety implications or disruption to other road users.
- 5.6 The E7 is available in 3 models, these being the "S", "SE" and "XS", all 3 models are available in Short Wheel Base (SWB) and Long Wheel Base (LWB) versions. The following conditions of fitness are those where the Peugeot E7 **does not meet** the current specification:

7. *Manoeuvrability requirement*

- 7.1 *The vehicle must be capable of being turned on either lock so as to proceed in the opposite direction without reversing between two vertical parallel planes not more than 8.535 metres apart.*

E7 SWB – turning circle 11.5 metres

E7 LWB – turning circle 11.9 metres

14. *Body*

- 14.2 *The overall length must not exceed 5 metres. This is essential for determining the size of taxi ranks, other pick-up points and for the free access and flow of other vehicles in London's congested streets.*

E7 LWB – overall length 5.136 metres

- 15.8 *Where seats are placed facing each other, there must be a minimum space of 425mm between any part of the front of a seat and any part of any other seat which faces it, provided adequate foot room is maintained at floor level.*

E7 SWB & LWB – as below;

There is a minimum seat distance of 350mm only on the single offside flip seat when the rear triple bench seat is fully forward, to allow greater luggage space, when the seats are in the furthest back position the distance between the offside seat and the rear bench is 600mm and the distance between the other two flip seats is 770mm.

16. Passenger compartment

16.2 *Occasional seats must be so arranged as to rise automatically when not in use. They must be placed at least 40mm apart. When not in use, they must not obstruct doorways.*

E7 SWB & LWB – 20mm apart

18. Visibility

18.2 Passenger Visibility

The windows should maximise passenger visibility into and out of the vehicle. The top of the window line for front and side windows, when measured vertically to the top of the visible portion of the glass, must not be less than 780mm on any glass panel forward of or beside the seated passenger. The vertical distance is to be measured through the E point as defined in Directive 77/649/EEC, from the top of the uncompressed rear forward-facing passenger seat cushion to the first point of totally obscured glass. Manufacturers are to declare conformity to this condition in drawing format.

E7 SWB & LWB – 750mm minimum vertical distance

18.4 *Passenger windows must be capable of being opened easily by passengers, including those in wheelchairs, **when seated**. The control for opening a window must be clearly identified to prevent it being mistaken for any other control.*

6. CONSULTATION RESPONSES

6.1 The consultation was launched on 1st February 2013 for a 12 week period, ending on 25th April 2013. A public notice was published in the Peterborough Telegraph on Thursday 31 January 2013. A copy is attached at **Appendix C**.

6.2 A log of the responses received in relation to the conditions of fitness for hackney carriage vehicles is attached at **Appendix D**.

6.3 All responses received in relation to the conditions of fitness for hackney carriage vehicles have been collated and distributed in full to the Licensing Committee Members.

6.4 On Monday 25th February 2013 the Peugeot E7 and the LTI TX4 were made available for members of the licensing committee to view. Simon Guilliat and Ian Hallam represented Allied Vehicles Limited and Paul Kelsey represented London Taxi Company, and Adrian Day represented Peterborough City Council. The members of the licensing committee who attended the viewing included Cllr Paula Thacker, Cllr John Peach, Cllr Peter Hiller and Cllr Pam Kreling.

The following points of interest were raised by members:

- 1) The possibility of having an audible warning in the passenger cabin to alert passengers if the door is not fully closed. *(This can be installed as an optional extra).*
- 2) There was some concern that the passenger door requires excessive force to close from the fully open position. *(The vehicle demonstrated was new, adjustment may have been required).*

3) When a wheelchair was secured using the inertia restraints although the restraints were fully locked in position some movement of the wheelchair was possible. (*Slight movement is possible in a 2 point restraint system; although a 4 point system is available. In addition for demonstration purposes the wheelchair was empty which will have an effect*).

6.5 The Peugeot E7 will be available for viewing on the day of the licensing committee meeting in order to give any members of the committee to inspect the vehicle.

6.6 On 18th April 2013 the Peugeot E7 was demonstrated to DIAL – Peterborough Disability Forum, forum members present were Bryan Tyler Disability Forum Chair and Brian Gascoyne Disability Forum Lead on Hackney and Private Hire. Simon Guilliat represented Allied Vehicles Limited and John Goodwin represented Peterborough City Council.

6.7 The stakeholders representing trade groups, organisations or businesses who have submitted detailed responses to the consultation will be invited to attend the licensing committee meeting; this is in order to present their responses in person and to be available to answer questions or clarify information as required. These stakeholders are listed below:

- Allied Vehicles Limited
- PHCF – Peterborough Hackney Carriage Federation
- DIAL – Peterborough Disability Forum
- Cambridgeshire Constabulary
- PCC Network Team (Peter Tebb)
- London Taxi Company
- Mr Brian Gascoyne (former secretary of PHCF)

6.8 A petition in favour of the Peugeot E7 signed by 84 drivers / owners dated 13 September 2011 has been submitted, this was compiled prior to the commencement of the consultation.

6.9 A detailed response to the consultation was submitted by Mr Ian Robinson Regulatory Officer (Peterborough City Council). It should be noted that the comments mentioned within this response are the personal opinions of the officer, not those of the service or department. Therefore this response must be treated as a response from an individual and not be considered in anyway as an officer recommendation.

6.10 A summary of the responses received can be found below:

Allied Vehicles Limited

In their response Allied Vehicles has suggested the council amends its conditions of fitness to allow the full range of the E7 to be licensed, subject to the appropriate conditions on colour, livery etc to enable the travelling public to distinguish the E7 from Private Hire vehicles.

They believe that drivers and passengers should enjoy the choice of the vehicle in Peterborough as with elsewhere in the country. They report the E7 as being the UK's most popular partitioned Hackney Carriage being licensed in 98% of licensing authorities.

It will allow users of larger type wheelchairs to travel safely and accommodate wheelchairs that presently are unable to travel in the existing Hackney Carriage fleet. They have mentioned that this is a reasonable adjustment to Peterborough's licensing policy required by the Equality Act 2010 to promote accessibility, and refusing it cannot be justified.

They also go on to say that by refusing to amend the current conditions would also breach EU law as none of the said conditions are proportionate or can be properly justified on public health and safety grounds.

The success of the E7 is due to its lower cost compared to the other approved vehicles. Other benefits include lower operating and repair costs, additional seating and luggage capacity, fewer emissions and markedly better accessibility for wheelchair users.

The E7 is licensed by every UK licensing authority apart from Peterborough and 6 others.

They have expressed concerns in relation to the trading future of LTI and the manufacture and supply of parts for the vehicles that make up the bulk of Peterborough's Hackney Carriage fleet.

No vehicle is made for use of a Hackney Carriage that is truly equally accessible to everyone. The most effective way to meet most people's needs is therefore to facilitate a market where would-be passengers can choose from a range of vehicles.

Allied Vehicles have also made reference to previous legal challenges and attached appendices.

Some wheelchair users can only be turned and secured in the E7 this is demonstrated in a DVD that accompanied the response.

Peterborough Hackney Carriage Federation

The federation is apposed to the Peugeot E7 being licensed as a hackney carriage, they believe that the relevant conditions should remain unchanged and current standards remain in force. They have concerns in relation to the turning circle of the E7 in particular on Broadway where the road is narrow.

They feel that the larger (length) vehicle will have an effect on the limited rank space. They believe that the Peugeot E7 is an inferior vehicle to the purpose built LTI vehicles and will have a detrimental effect on the trade and hackney carriage users in general.

Peterborough Disability Forum

The disability forum gave a very comprehensive response in relation to the technical specification of the E7, in summary they would recommend the E7 to be licensed as a hackney carriage vehicle and suggest it would be beneficial to the majority of people with disabilities in the Peterborough City Council area. They suggest it compares equally with the current LTI TX4 Hackney Carriage vehicle. However their recommendations are subject to the following items being fitted to the vehicle prior to licensing.

- a) The vehicle is fitted with a tip-up "swivel seat" on the nearside to assist passengers with physical disabilities or impairments, prior to seating. This is standard on all LTI TX4 models.
- b) That the vehicle is fitted with an extra step on the off-side of the vehicle in order to assist passengers with physical impairments to alight and dismount in safety and comfort from either side of the vehicle.
- c) That the vehicle is fitted with a "loop system" for those with a hearing impairment.

In addition to the response received from the Peterborough Disability Forum we have contacted Mr Brian Gascoyne, Disability Forum Lead for Hackney and Private Hire, in an attempt to quantify the numbers of larger non-standard type wheelchair users in Peterborough. Whilst the data is not specific it appears to indicate the number of larger type wheelchair users is on the increase.

Cambridgeshire Constabulary

Cambridgeshire Constabulary are not in favour of policy changes to allow the E7 to be licensed as a Hackney Carriage, they feel that the increased turning circle will exacerbate

traffic congestion issues in bottlenecks in the city centre such as Broadway, with a possible delay in traffic flow and a potential increase in “road rage”.

The longer vehicle will cause capacity issues on the ranks, displacing vehicles to park elsewhere, possibly illegally.

The distinction between currently licensed E7’s as private hire vehicles, specific livery would need to be considered.

They believe that the current TFL conditions for fitness should remain as a good guide for maintaining the standard of taxi’s.

Peterborough City Council Networks Team

The Tesco ranks are probably the most heavily used ranks throughout the day and during evening/night-time economy, Broadway is a busy traffic route with a high proportion of buses and significant pedestrian movement

Having E7’s undertake three point turns in the carriageway at this location has the potential to increase local congestion and the likelihood of traffic collisions, but were unable to quantify this in anyway. Whether the increased risks at this busy location are material and sufficient to suggest that E7s should not be permitted as Hackney Carriage vehicles they could not comment.

London Taxi Company

The London Taxi Company in their response have mentioned that the company is now trading following the purchase of the company by Geely UK Ltd in February and have declared that the company is more secure than it has ever been.

They feel that the distinction of the conventional Hackney Carriage (Taxi) is necessary for the travelling public and stops confusion with private hire vehicles. It has been mentioned that if the conditions were amended it would allow converted vans to become licensed and would dilute the recognisable fleet.

With reference to the specific conditions of fitness comments include: The turning circle is required to allow Hackney’s to make a quick secure u-turn in order to pick passengers up on the opposite side of the road thus negating the need for them to cross the road. They have suggested that Allied Vehicles may be able to adapt the E7 to meet the turning circle.

They further mention:

- The TX has two useful features fitted as standard not found in the E7; namely a swivel seat to assist entry for ambulant disabled, and an induction loop (as standard) for those with hearing impairments
- The TX ramp is more stable and secure than the E7
- Allied Vehicles’ E7: ‘High force is needed to open the door: Wheelchair users with limited hand movement had difficulty in opening the door’
- Allied Vehicles’ E7 has ‘less head room than the TX. Some users needed to duck when entering the cab’.
- ‘The door height and width are also greater for the TX, making Wheelchair access better’

Peterborough and District Branch Multiple Sclerosis Society

The society support the change in policy to allow the E7 to be licensed as a Hackney Carriage vehicle, they feel that whilst there are deficiencies in the vehicle in relation to headroom when loading a wheelchair, steepness of the ramp due to floor height above ground, however they feel there are clear advantages with the vehicle by moving the rear

seats backwards and forwards to allow a wheelchair user to travel facing forwards or backwards.

Mr Brian Gascoyne (former secretary PHCF)

The response is in favour of models of the E7 being licensed with adequate features to suit the visually or hearing impaired passengers. He does not favour the licensing of the complete range where basic models would not have the required features.

Concerns have been raised in relation to not amending the conditions insofar as the future manufacturing of the LTI TX series may be questionable, if this was to cease it would only leave the Mercedes Vito as an approved vehicle.

Mr Gascoyne goes on to comment in relation to the current conditions of fitness where the E7 does not meet the criteria; the comments are favourable and supportive of the licensing of the E7 as a Hackney Carriage vehicle. He also comments on the benefits of the E7 over the LTI TX4, such as the addition of side steps allowing greater passenger mobility, and the moveable rear seats allowing the accommodation of larger wheelchairs which cannot currently be transported in the LTI range.

Individual drivers

The main responses from the drivers relate to the lack of choice when it comes to vehicles approved to be licensed as Hackney Carriage vehicles, they also feel that there should be more affordable cost effective vehicles available as an option. They have mentioned that the current LTI TX4 and the Mercedes Vito currently approved are expensive as compared to the E7.

7. VEHICLE INFORMATION

7.1 The key features and benefits of the Peugeot E7 as supplied by Allied Vehicles Ltd.

- a. Wheelchair ramps fitted with safety guide.
- b. Pull Out under floor wheelchair ramp with 300kg weight limit and side guides. **(SE and XS models only)**
- c. The E7 can accommodate a DDA reference wheelchair of 1200mm length.
- d. Sliding rear bench seat to allow extra luggage space in boot, while still maintaining adequate passenger space for 6 people. **(all models)**
- e. Semi automatic rear door release (operated by driver) to unlock and release the rear passenger doors to help passengers exit or enter the taxi. **(all models)**
- f. Drivers isolation feature (to lock the driver in the front compartment) so passengers can only get into the rear. **(all models)**
- g. Indicator locking (when the indicator is on it locks the opposite doors to stop passengers exiting into the road/traffic). **(all models)**
- h. Fully opening rear windows, to help ventilation in the passenger compartment. **(all models)**
- i. Highly visible front and rear LED taxi signs along with LED rear "doors opening" sign fitted into rear spoiler to warn other motorists. **(all models)**
- j. A full size spare wheel fitted under the rear of the vehicle (so it doesn't get in the way of luggage)
- k. Electric Step(s) operated by the driver to bridge the gap between the road and the taxi floor (especially when there is no kerb available). **(1 manually operated on S model, 1 on SE model, 2 on XS model)**
- l. Forward facing wheelchair restraints, these allow a wheelchair and passenger to be transported forward facing using a 4 point harness system. **(optional on all models £300)**
- m. A swivel nearside rear facing flip seat to help non wheelchair disabled and the elderly exit and enter with ease. **(optional on all models £750)**
- n. 42.8mpg combined from the manual gearbox 2.0 130bhp engine with 172 g/kg carbon dioxide.

7.2 Emissions and running cost comparison of the Peugeot E7 and the LTI TX4

	Peugeot E7		LTI TX4	
	Manual	Automatic	Manual	Automatic
Emissions	172g/km	199g/km	211g/km	233g/km
Fuel Consumption Combined	42.8mpg	37.1mpg	35.2mpg	32.0mpg
Road Tax	£195	£250	£270	£460
Service Intervals	12500 miles	12500 miles	12000 miles	12000 miles
Major Service	37500 miles	37500 miles	36000 miles	36000 miles

7.3 Vehicle purchase cost comparison of the Peugeot E7 and the LTI TX4

	Model	Manual	Automatic
Peugeot E7	S	£25,500	£27,500
	SE	£26,500	£28,500
	XS	£28,500	£30,500
LTI TX4	Style	£31,995	£33,995
	Elegance	£33,995	£35,995

8. CONSIDERATIONS

- 8.1 In considering the request to review the conditions of fitness in relation to Hackney Carriage vehicles the committee should regard the following information.
- 8.2 The committee should consider the implications, risks and consequences of amending the conditions in particular any related to safety.
- 8.3 It has been mentioned that the turning circle of the E7 is greater than the current condition allows, the committee should consider the implications of this, the main area of concern is the Broadway taxi ranks where as part of the ranking system drivers are required to carryout at least one u-turn. This has been tested with an E7 by a representative of Allied Vehicles Ltd who was unable to perform a u-turn successfully in this location. The committee will need to consider what weight should be placed on this condition and make a determination proportionate to the alleged risks as mentioned in some of the responses.
- 8.4 If the committee’s decision is to amend the conditions as requested, the committee will need to determine if the conditions should be amended sufficiently so that the E7 meets the criteria, or to remove some or all of the conditions completely.
- 8.5 The committee should be mindful that there are various models of the E7 including the “S”, “SE” and the “XS, also short wheelbase (SWB) and long wheelbase (LWB) versions. Also there are optional extras available some of which the committee may wish to see as mandatory if the E7 is approved in Peterborough following the consideration of the consultations responses.
- 8.6 The committee should also consider that the E7 is already licensed in Peterborough as a Private Hire vehicle; hence if the E7 is approved to be licensed as a Hackney Carriage vehicle there will be a need to have adequate measures in place so that the travelling public can distinguish between the 2 types of vehicles. A solution could be to insist on the mandatory requirement to have the taxi livery prominently displayed as with the Mercedes Vito.
- 8.7 The committee should also consider that the age limit for a Hackney Carriage vehicle is set at 15 years maximum, at reaching this age the vehicle is de-licensed. The age limit for a Private Hire vehicle is set at 10 years maximum, at reaching this age the vehicle is de-licensed. As the E7 is already licensed as a Private Hire vehicle the committee will need to determine if the E7 licensed as a Hackney Carriage vehicle if approved should have a terminal year of 10 years as with the Private Hire version.

Although the Mercedes Vito is licensed as both Private Hire and Hackney Carriage vehicles the 2 versions differ as the vehicle licensed as a Hackney Carriage has the additional rear steer axle mechanism allowing it to meet the current turning circle requirements. Therefore Vito's licensed as Private Hire vehicles have an age limit of 10 years and Vito's licensed as Hackney Carriage vehicles have an age limit of 15 years.

9. RISKS

- 9.1 There have been no risks identified with the licensing of the E7 as a Hackney Carriage in Peterborough in relation to health and safety of the travelling public, drivers or members of the public. Also Allied Vehicles in their response report there have been no safety concerns or problems with the E7 of any kind in any licensing authority.
- 9.2 The current LTI TX4 Hackney Carriage cannot accommodate some of the larger electric wheel chairs therefore they have to be transported in Private Hire vehicles quipped with a rear tail lift.
- 9.3 It has been suggested in the responses from the Cambridge Constabulary, Peterborough City Council's Network Team Manger and the Peterborough Hackney Carriage Federation that the ability not to complete the required u-turn in Broadway could cause congestion in the city centre.

7. ANTICIPATED OUTCOMES

- 7.1 The Licensing Committee to make decision and this will form part of the Taxi and Private Hire Licensing Policy / Guidance document.

8. REASONS FOR RECOMMENDATIONS

- 8.1 To comply with statutory requirements regarding the regular review of licensing policies.
- 8.2 To consider the request received from Allied Vehicles Ltd to review the policy.
- 8.3 To ensure that the policies and procedures continue to be fit for purpose.

9. ALTERNATIVE OPTIONS CONSIDERED

- 9.1 Retain the status quo.

10. IMPLICATIONS

- 10.1 **Financial** – There are costs associated with undertaking a public consultation exercise, however there are also costs associated where a policy is challenged due to it not being fit for purpose.
- 10.2 **Legal** – Legal support has been provided by the council's legal team regarding the provision of advice and guidance on taxi licensing matters and the requirements of the consultation. Some advice has also been provided by counsel.

11. BACKGROUND DOCUMENTS

Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985)

The Local Government (Miscellaneous Provisions) Act 1976
The Town and Police Clauses Act 1847
Equality Act 2010