



Licensing Committee

20 November 2013

Report Title Proposed Revisions to Hackney Carriage & Private Hire Criteria

Accountable Strategic Director Tim Johnson
Education and Enterprise

Originating service Licensing Services

Accountable employee

Name	Elaine Moreton
Tel	01902 555033
Email	elaine.moreton@wolverhampton.gov.uk

Recommendation(s) for action or decision:

The Licensing Committee is recommended to:-

- (i) Consider responses to a consultation undertaken by the Council. These are attached at Appendix A and B of this report.
- (ii) Approve and endorse for implementation the revised hackney carriage criteria.
- (iii) Approve and endorse for implementation the revised private hire vehicle criteria.
- (iv) Approve and endorse the implementation of a drug policy for hackney carriage & private hire vehicle drivers.

1.0 Purpose

- 1.1 This report is intended to inform the Licensing Committee of a proposal to revise the existing hackney carriage and private hire vehicle criteria.
- 1.2 The Licensing Committee is requested to consider responses received as a result of the consultation undertaken by Licensing Services relating to vehicle criteria and the drug policy for drivers.
- 1.3 Councillors are requested to approve and endorse the revision of the hackney carriage and private hire vehicle criteria, detailed at 5.0 below.
- 1.4 The Licensing Committee is requested to approve and endorse the implementation of a drug policy for hackney carriage and private hire vehicle drivers.

2.0 Background

- 2.1 Hackney carriage and private hire licensing is a non-executive function and it is therefore the responsibility of Licensing Committee to determine the policy and procedures in respect of this matter.
- 2.2 At the Hackney Carriage and Private Hire Working Group meetings held on 29 July 2013 a range of issues were discussed with the trades. These primarily focused on age requirements, vehicle livery and drug testing.
- 2.3 Members of the Hackney Carriage Working Group raised the issue that the Council increase the maximum age limit that hackney carriages can continue to be licensed until.
- 2.4 During the Private Hire Working Group meeting a number of requests were highlighted by trade representatives, these include:-
 - that the Council increase the maximum age limit that private hire vehicles can continue to be licensed until.
 - that the exceptional condition criteria is removed.
 - that the display of roof signs is removed.
- 2.5 On 29 July 2013 a demonstration from Dräger in regard to drug testing was received by both Hackney Carriage and Private Hire Working Groups. The product demonstrated is a saliva based test which has Home Office approval and can detect traces of the eight most commonly used prohibited recreational substances.

3.0 Proposals

- 3.1 The requests outlined in Section 2 have been subject to a formal consultation process.

4.0 Consultation

- 4.1 The consultation period commenced on 30 August 2013 and ended on 11 October 2013.
- 4.2 The consultation exercise sought views on age criteria and revised exceptional condition criteria, vehicle livery requirements and drug testing.
- 4.3 The Council has consulted with the following agencies and trade bodies:-
- Members of the Hackney Carriage Working Group
 - Members of Taxi Owners Association (TOA)
 - Member of Wolverhampton Hackney Carriage Drivers Association (WHCDA)
 - All existing private hire operators
 - The Chief Officer of Police
 - Members of the Private Hire Working Group
 - Wolverhampton Private Hire Owners Association
 - WCC Environmental Health (Commercial)
- 4.4 Copies of the consultation responses are attached at Appendix A and B of this report

5.0 Summary of Recommendations

- 5.1 Following consultation the following is recommended.
- 5.2 Revised Hackney Carriage Age Criteria
- 5.2.1 It is recommended that the upper age limit remains unchanged at 16 years.
- 5.3 Hackney Carriage Exceptional Conditional Criteria
- 5.3.1 It is recommended that should Councillors agree to retain the current upper age limit of 16 years old for hackney carriage vehicles, the existing exceptional criteria policy and the requirement for a full service history from date of first registration be removed. However vehicles will be subject to two MOT's a year and a rigorous compliance inspection by Licensing Services to ensure the vehicle is fit for purpose with an appeal to the Licensing Manager.
- 5.4 Revised Private Hire Age Criteria
- 5.4.1 It is recommended that the age limit for vehicles to be accepted onto the fleet should be increased from eight to 10 years old.
- 5.4.2 It is also recommended that the upper age limit be increased from 10 to 12 years old.
- 5.4.3 These measures will also be subject to a 12 month pilot period, with a further report to the Licensing Committee following completion of the pilot.

5.5 Private Hire Exceptional Conditional Criteria

- 5.5.1 It is recommended that should Councillors agree to the proposed upper age limit of 12 years old for private hire vehicles, the existing exceptional criteria policy should remain unchanged.

5.6 Private Hire Livery

- 5.6.1 It is recommended that further consultation takes place regarding the request that the display of roof sign criteria be removed.

5.7 Drugs Policy Proposal

- 5.7.1 Both hackney carriage and private hire trades are in agreement that the Council should implement a drugs policy in relation to hackney carriage and private hire vehicle drivers.
- 5.7.2 Licensing Services will consider a draft drugs policy for hackney carriage and private hire drivers. This will be presented to Licensing Committee for approval and subsequent amendments to the "Guidelines Relating to the Relevance of Convictions and Breaches of Licence Conditions" and licence conditions will be required.

6.0 **Financial implications**

- 6.1 There are no direct financial implications from this report. [RT/06112013/X]

7.0 **Legal implications**

- 7.1 The Local Government (Miscellaneous Provisions) Act 1976 allows the local authority to condition licences for hackney carriage and private hire vehicles.
- 7.2 Section 47 of the Local Government (Miscellaneous Provisions) Act 1976 provides that a district council may attach to the grant of a licence of a hackney carriage under the Town and Policies Causes Act of 1847 such conditions as the district council may consider reasonably necessary.
- 7.3 Section 48(1) of the Local Government (Miscellaneous Provisions) Act 1976 provides that a district council may determine a private hire vehicle application taking into account various factors. These include being satisfied that the vehicle is in a suitable mechanical condition.
- 7.4 Section 48(2) provides a district council may attach to the grant of a private hire vehicle licence such conditions as they may consider reasonably necessary.
- 7.5 Section 50 of the Local Government (Miscellaneous Provisions) Act 1976 provides that the proprietor of any ... private hire vehicle licensed by a district council shall present such ... private hire vehicle for inspection and testing by or on behalf of the council within such period and at such place within the area of the council as they may by notice reasonably require. Provided that a ... council shall not ... require a proprietor to present

the same ... private hire vehicle for inspection and testing on more than three separate occasions during any one period of twelve months.

- 7.6 Section 68 of the Local Government (Miscellaneous Provisions) Act 1976 gives authorised officers of the council and the police powers which are additional to the requirements of Section 50 and allows such officers, if on inspection they are not satisfied as to the vehicle's fitness, to require the vehicle or its taximeter to undergo a further inspection.
- 7.7 The Local Government (Miscellaneous Provisions) Act 1976 also allows the Local Authority to condition licences for private hire drivers.
- 7.8 Section 51 of the Act provides that the Council may attach such conditions to a driver's licence as are reasonable.
- 7.9 There is no equivalent power in relation to hackney carriage drivers, however, hackney carriage and private hire licensing is a non-executive function and therefore the Licensing Committee can determine policy and procedures in respect of this and as such can approve and endorse a drug policy which will apply to private hire and hackney carriage drivers [SH/08112013/E].

8.0 Equalities Implications

- 8.1 This report has no implications for the Council's Equal Opportunities Policy.

9.0 Schedule of background papers

- 9.1 Licensing Committee
Private hire vehicle criteria 25 May 2011, 27 June 2012

Hackney Carriage Consultation Responses

Q1. Age Limit

- (a) Do you think the upper age limit of 16 years for Hackney Carriage vehicles should be extended? If yes please provide evidence to support how public safety will not be compromised.

Yes (3)	No (3)
<p>(i) As long as the vehicle is in good condition and gets through its MOT. But I do believe the vehicle must be in good condition i.e. no dodge paintwork or repairs - TOA</p> <p>(ii) The MOT criteria (checking List) test checks components and also checks the vehicle all over to make sure it is safe to transport public. Other Towns/Cities/Boroughs don't have limits like Wolverhampton does. MOT certificate's (Two Tests) is sufficient to know that vehicle is public safe - Hackney Carriage Proprietor</p> <p>(iii) Taxis pass MOTs twice a year which is sufficient evidence to support public safety, other towns only have one MOT - Hackney Carriage Proprietor</p>	<p>(iv) No - Associated Taxis</p> <p>(v) No - Hackney Carriage Proprietor</p> <p>(vi) No it is regarded that the existing age limit for Hackney Carriage Vehicles is sufficient. The mileage recorded on vehicles of 16 years old can be substantial and general wear and tear on the vehicle increases. It is also regarded that older vehicles will be detrimental to the image and regeneration of the City - Environmental Health (Commercial)</p>

Q2. Exceptional Condition Criteria

- (a) Do you think the existing Exceptional Condition Criteria for Hackney Carriage:- “There shall be an authenticated service history of the vehicle from the date of first registration”. Is the acceptable or necessary? If no please give details of a more appropriate criteria.

Yes (1)	No (4)	Comment
<p>(v) Yes - Hackney Carriage Proprietor</p>	<p>(i) A Full Service History is not an indication of the condition of a vehicle all it shows is the vehicle has been serviced at the recommended intervals, in order for a vehicle to last 16 years you would have to service it regularly anyway. Plus the service book only goes upto.... – TOA</p> <p>(ii) Vehicles having a full service criteria is a waste of time. Passing a MOT should be sufficient enough. Records of Taxis passing MOTs should be available from Council Records. All vehicles get serviced twice every year, but this should not be a requirement or a criteria - Hackney Carriage Proprietor</p> <p>(iii) Taxis have two MOT's a year, taxis are serviced minimum twice a year. The Council's should have all records of taxis passing MOT's (Archives). There is no need for exception condition criteria - Hackney Carriage Proprietor</p> <p>(iv) Sometimes drivers do their own service on the vehicles and so do not receive a service stamp - Associated Taxis</p>	<p>(vi) It is regarded than an exceptional criteria should be devised to ensure that where vehicles are permitted to be extended over the existing age limit that an appropriate assessment of the vehicle history, as well as a robust compliance check are undertaken to ensure safety and the vehicles contribute towards the regeneration of the City - Environmental Health (Commercial)</p>

Q2. Exceptional Condition Criteria

(b) Do you think if the vehicle passes an MOT it should be allowed to continue to be licensed as a Hackney Carriage after 16 years of age? Please state reason.

Yes (4)	No (2)
<p>(i) I've ticked yes but it should not be as Black and White as just passing an MOT. Not all types of Hackneys will look or be very good after 16 years they should still have to meet a certain criteria and must be of a good standard internally and externally, especially bodywork i.e. not been patched up etc - TOA</p> <p>(ii) If vehicle is passing its MOT' and vehicle is of good condition, then that should be sufficient enough to continue to be licensed like Birmingham and other authorities - Hackney Carriage Proprietor</p> <p>(iii) Taxis are passing MOT's having minimum two services per year tested by Vosa garages. This should be sufficient to prove that vehicles are mechanically ok - Hackney Carriage Proprietor</p>	<p>(iv) Associated Taxis</p> <p>(v) Because the original policy has not been in force long enough to remove old vehicles in order to have enough new vehicles to replace them. Once they are enough newer vehicles there should be no need to continue after 16 years of age for the public interest and the environment - Hackney Carriage Proprietor</p>

Q3. Drug Policy

(a) Should drivers be found to test positive to a drug test, it is proposed that drivers will receive an immediate suspension until they can demonstrate they have engaged on a drug related Treatment Programme. Do you agree with this course of action? If no please state reasons

Yes (4)	No (2)
<p>(i) Yes - TOA</p> <p>(ii) Yes - Hackney Carriage Proprietor</p> <p>(iii) Yes - Hackney Carriage Proprietor</p> <p>(vi) Environmental Health Commercial fully supports this policy and agreed that a driver who fails a test or fails to have a test should be immediately suspended. If a driver has been tested positive for drugs it is further supported that the driver should remain suspended until they have engaged on a drug related treatment programme - Environmental Health (Commercial)</p>	<p>(iv) Badge should automatically be removed - Associated Taxis</p> <p>(v) Not all Hackney Carriage/Private Hire vehicle drivers are members of an association such as the TOA. Members if the association can voluntarily agree to complete a drug test, however, drivers who are not should be given the option to decline, as they have not agreed that a drug policy to test drivers should be implemented. Drivers can legally decline. Wolverhampton City Council have not submitted a relevant argument with substantial evidence, such as Police records and statistics on the prosecution of offending Hackney Carriage/Private Hire Drivers, which supports the necessity for drivers to be tested - Hackney Carriage Proprietor</p>

Q3. Drug Policy

(b) Should the Council suspend drivers if they fail to attend a drug test when requested to do so and keep the suspension in place until they have attended and passed a drug test. Do you agree with the course of action? If no please state reasons.

Yes (4)	No (2)
<p>(ii) But if there is a valid reason or appointment of any kind which can be proved, then they should be exempt of a suspension - Hackney Carriage Proprietor</p> <p>(iii) As long as they have a valid reason not to attend, depending on situation they should be exempt of a suspension - Hackney Carriage Proprietor</p> <p>(iv) Badge should automatically be removed - Associated Taxis</p> <p>(vi) Environmental Health Commercial fully supports this policy and agreed that a driver who fails a test or fails to have a test should be immediately suspended. If a driver has been tested positive for drugs it is further supported that the driver should remain suspended until they have engaged on a drug related treatment programme - Environmental Health (Commercial)</p>	<p>(i) If a driver can't make the appointment at that particular hour he should be allowed the chance to attend at a different time on the same day - TOA</p> <p>(v) Not all Hackney Carriage/Private Hire vehicle drivers are members of an association such as the TOA. Members if the association can voluntarily agree to complete a drug test, however, drivers who are not should be given the option to decline, as they have not agreed that a drug policy to test drivers should be implemented. Drivers can legally decline. Wolverhampton City Council have not submitted a relevant argument with substantial evidence, such as Police records and statistics on the prosecution of offending Hackney Carriage/Private Hire Drivers, which supports the necessity for drivers to be tested - Hackney Carriage Proprietor</p>

Are there any other issues you would like to be considered?

- (i) The main concerns are still the about the number of Hackneys in Wolverhampton, the drivers feel the council is ignoring the issue and not listening. Drivers are currently queuing up to 2 hours between jobs so what will happen if the cab numbers kept on increasing - **TOA**
- (ii) Change replacement age. We should allow vehicles to be replaced the same age or newer than taxi being replaced - **Hackney Carriage Proprietor**
- (iii) Replacement age should no longer be up to 5 years but should be able to replace same age or newer than vehicle being replaced - **Hackney Carriage Proprietor**
- (iv) No other issues raised - **Associated**
- (v) Wolverhampton City Council have u-turned on the policy of new drivers having to buy a brand new cab, up to the age of 8 years old, over a period of time. And now to change it to 16 years old to 20 years old, would result in more older cabs than new, compromising public safety. Drivers who adhered to the original policy purchased new cabs at significant cost to themselves, and many are still paying their loans. Therefore, in a matter of time if some new drivers leave and look to work in other councils, Wolverhampton City Council will only have old vehicles and not new ones. If this policy goes ahead, should Wolverhampton City Council consider voluntary compensation for the new drivers who brought new cabs with loans in adherence to the original policy? - **Hackney Carriage Proprietor**

Private Hire Consultation Responses

Q1. Age Limit

- (a) Do you think the upper age limit of 10 years for Private Hire vehicles should be extended? If yes please provide evidence to support how public safety will not be compromised

Yes (5)	No (1)
<p>(i) Vehicles over the age of six have two tests to ensure roadworthiness. MOT provides enough information of roadworthiness.</p> <p>(ii) If the vehicle passes an MOT test and is inspected as per current arrangements, age should not effect or compromise safety - ABC Countdown Cars Ltd</p> <p>(iii) Should be down to the discretion of the Council to the condition of the car.</p> <p>(iv) Modern car better made - Wednesfield Radio Cars</p> <p>(v) As you well know Central Government have put forward a propositions, although over turned, to include wedding cars within Private Hire licence conditions, as they event consider this proposal it is proof that they consider safety would not be compromised and most wedding cars are over 10 years of age - ABC Leisure Group Limited</p>	<p>(vi) No it is regarded that the existing age limit for private hire vehicles is sufficient. The mileage recorded on vehicles of 10 years old including owner driver vehicles which are replacing the traditional “company fleet vehicles” can be substantial and general wear and tear on the vehicle increases. It is also regarded that “older vehicles” will be detrimental to the image and regeneration of the City - Environmental Health (Commercial)</p>

Q1. Age Limit

(b) Do you think the age that vehicles can enter the fleet should be extended? (Currently under 8 years of age)

Yes (4)	No (2)
<p>(i) Rising cost of vehicle maintenance, some leeway should be allowed to recover cabs</p> <p>(ii) Quality and appearance should count, not age. Age does not compromise safety - ABC Countdown Cars Ltd</p> <p>(iv) Modern cars better made - Wednesfield Radio Cars</p> <p>(v) Age has no bearing on the condition of a vehicle when it is maintained to suit the purpose. An annual MOT is sufficient to provide a record that the vehicle is fit for use at the time it was inspected. Whilst Licence conditions emphasise on age they should consider miles to be the most important issue, a vehicle of 3 years of age that has covered 200,000 miles must be considered to be in a more vulnerable condition than a 10 year old vehicle that has covered 3,000 miles. Wolverhampton Council also have to consider the part they play in compromising public safety, the above only relates to the vehicle age when they should be considering the driver that has no alternative to make excessive use of the vehicle to pay for fees imposed by Council followed by road tax and insurance before the vehicle turns a wheel. This may be the reason that the public have to travel in such vehicles of four and five years of age that look and feel like they have been around the clock, pardon the expression - ABC Leisure Limited</p>	<p>(iii) There would be too many old cars as taxis.</p> <p>(vi) Refer the comments detailed above, however, this is not so as opposed, as long as the upper age limit was not extended - Environmental Health (Commercial)</p>

Q2. Exceptional Condition Criteria

- (a) Do you think the existing Exceptional Condition Criteria for Private Hire Vehicles:- “There shall be an authenticated service history of the vehicle from the date of first registration”. Is the acceptable or necessary? If no please give details of a more appropriate criteria.

Yes (1)	No (5)
<p>(vi) It is regarded than an exceptional criteria should be devised to ensure that where vehicles are permitted to be extended over the existing age limit that an appropriate assessment of the vehicle history, as well as a robust compliance check are undertaken to ensure safety and the vehicles contribute towards the regeneration of the City - Environmental Health (Commercial)</p>	<p>(i) MOT and general maintenance is enough legal requirement for the vehicles paper road worthiness</p> <p>(ii) As long as the vehicle is of the required standard - ABC Countdown Cars Ltd</p> <p>(iii) Some drivers maintain their own vehicles to a high standard.</p> <p>(iv) Sometimes service history is lost - Wednesfield Radio Cars</p> <p>(v) Although a vehicle requires servicing it has no bearing in its condition and in turn provides a false statement of the vehicles true status, although a vehicle is serviced there is no obligation to have repairs carried out until a MOT is required. A service consists of filter and lubricant replacements where repairs and replacements of other components require the customers authorisation; a service does not confirm that a vehicle is fit for use - ABC Leisure Limited</p>

Q2. Exceptional Condition Criteria

- (b) Do you think if the vehicle passes an MOT it should be allowed to continue to be licensed as a Private Hire after 10 years of age? Please state reason.

Yes (5)	No (1)
<p>(i) Market very competitive some allowances should be made for vehicle operators.</p> <p>(ii) The standards required currently is of a good level age should not be an issue - ABC Countdown Cars Ltd</p> <p>(iii) As long as the car is neat and tidy inside and out and mechanically sound.</p> <p>(iv) Providing body work is up to standard - Wednesfield Radio Cars</p> <p>(v) An MOT is to certify that a vehicle is fit for use at the time it was tested, age has nothing to do with the condition of the vehicle, a ten year old vehicle with low mileage would have received more attention than a three year old vehicle that is used 24/7 again I suggest that miles are a major factor not age - ABC Leisure Limited</p>	<p>(vi) It is regarded that a robust and full assessment of its mechanical and compliance is necessary should consideration be given to extending the life of a private hire vehicle to work after 10 years of age - Environmental Health (Commercial)</p>

Q3. Livery

What level of Livery should Private Hire Vehicles display?

(a) Should a Private Hire Vehicle display a roof sign

Yes (4)	No (2)
<p>(ii) Customer safety, Company identification. Private Hire users in Wolverhampton are used to signs on vehicles - ABC Countdown Cars Ltd</p> <p>(iii) While working as its easy for customers to know it's a taxi and what firm they work for. Also for compliant reasons</p> <p>(v) It is what most people look for when entering a Private Hire vehicle or taxi - ABC Leisure Limited</p> <p>(vi) A level of livery should be displayed to ensure the vehicle is identifiable to the general public that the vehicle is a private hire vehicle. It is regarded that the existing adhesive door signs and rear plate do make the vehicles very recognisable. However, it is acknowledged that problems are experienced by the trade with the existing door signs, therefore a similar sign that is more fit for purpose may be more appropriate - Environmental Health (Commercial)</p>	<p>(i) Too expensive to replace.</p> <p>(iv) Encourages plying for hire - Wednesfield Radio Cars</p>

Q3. Livery

What level of Livery should Private Hire Vehicles display?

(b) Should a Private Hire Vehicle display door stickers?

Yes (4)	No (2)
<p>(ii) A small door sticker would be adequate, may I suggest something in the area of 12 inches in length by 6 inches - ABC Countdown Cars Ltd</p> <p>(iii) Defines what Council you drive for and that it is a licensed vehicle</p> <p>(iv) Yes - Wednesfield Radio Cars</p> <p>(vi) A level of livery should be displayed to ensure the vehicle is identifiable to the general public that the vehicle is a private hire vehicle. It is regarded that the existing adhesive door signs and rear plate do make the vehicles very recognisable. However, it is acknowledged that problems are experienced by the trade with the existing door signs, therefore a similar sign that is more fit for purpose may be more appropriate - Environmental Health (Commercial)</p>	<p>(i) One external plate like other Councils is sufficient enough to meet the taxi criteria.</p> <p>(v) It is not necessary as private hire vehicles can also be used for private use, the Council stipulate that a door sign has to be fixed on the vehicle with adhesive and cannot be removed when the vehicle is not being used for private hire. Council also have a clause in the terms and conditions that enable an “executive” vehicle to be used for private hire without displaying door signs; this involves a payment to the Council of £75, it makes no sense that Council charge licence holders to omit door signs on executive vehicles when Council consider they are required to be displayed on other vehicles. Regarding the signs one statement contradicts the other, unless you are considered by Council to have an executive vehicle you have no option but to display door signs on the other hand if you do have an executive vehicle you can pay Council a fee and they are no longer required. Obviously Council do not consider them to be important as it would apply to have them on all vehicles with no get out clause when a fee is paid - ABC Leisure Limited</p>

Q4. Drug Policy

- (a) Should drivers be found to test positive to a drug test, it is proposed that drivers will receive an immediate suspension until they can demonstrate they have engaged on a drug related Treatment Programme. Do you agree with this course of action? If no please state reasons

Yes (5)

No (1)

(i) Yes.

(ii) Yes - **ABC Countdown Cars Ltd**

(iii) But it should be when they can prove they have stayed clean for 3 months as it is the same as driving while intoxicated. If it is prescribed drugs the drivers should be able to verify this via Drs letter or their name on their medication.

(iv) Yes - **Wednesfield Radio Cars**

(vi) Environmental Health Commercial fully supports this policy and agrees that a driver who fails a test or fails to have a test should be immediately suspended. If a driver has been tested positive for drugs it is further supported that the driver should remain suspended until they have engaged on a drug related treatment programme - **Environmental Health (Commercial)**

(v) If I read this question correctly Council state that drivers only have to engage on a drug related treatment programme for their suspension to be revoked, if this is correct a driver will be allowed to drive a private hire vehicle whilst they may be under the influence of drugs as the programme takes time to complete. A driver should have completed a programme before their licence is reinstated - **ABC Leisure Limited**

Q4. Drug Policy

- (b) Should the Council suspend drivers if they fail to attend a drug test when requested to do so and keep the suspension in place until they have attended and passed a drug test. Do you agree with the course of action? If no please state reasons.

Yes (6)	No (0)
<p>(i) Yes.</p> <p>(ii) Yes - ABC Countdown Cars Ltd</p> <p>(iii) If they have nothing to hide they would attend, failure to attend should be suspended.</p> <p>(iv) Yes - Wednesfield Radio Cars</p> <p>(v) Yes - ABC Leisure Limited</p> <p>(vi) Environmental Health Commercial fully supports this policy and agrees that a driver who fails a test or fails to have a test should be immediately suspended. If a driver has been tested positive for drugs it is further supported that the driver should remain suspended until they have engaged on a drug related treatment programme - Environmental Health (Commercial)</p>	

Are there any other issues you would like to be considered?

- (i) Set fare tables for all private hire. We all pay same licence fees so fares should be tabled to make level playing field.
- (ii) Operators should be obligated to report drivers of company cars that they have received a speeding or parking tickets for that particular driver - **ABC Countdown Cars Ltd**
- (iii) Private Hire should be able to use bus lanes the same as hackney cabs.
- (iv) Limit on Private Hire companies - **Wednesfield Radio Cars**
- (v) If you consider the cost to obtain a driver's licence, operator's licence and vehicle licence then add the car insurance followed by the operating costs of the vehicle Council should be able to access why private hire vehicles are not kept up to a standard to satisfy the public, as I have said they are required to be used 24/7 to meet the costs followed by having to charge high fares to meet those costs, this can only result in a diminishing service to the public. Council may also like to consider that the cost of operating a vehicle relates the amount the licence holder has to charge for fares if only to cover the initial set up costs, if a private hire or Hackney Carriage is to be operated as a service to the public then the fares should be consistent with those when using your own vehicle, all costs that Council imposed are passed on to the public which in turn reduces the demand that ultimately leads to a decline in the service being offered. The public are being forced away from using private hire and taxis in favour of using their own vehicles due to cost, like most of Government advice there is a price to pay because others jump on the band wagon. The question needs to be asked of Council what they consider to be important, being in control of a service that provides a solution for the public not to use their own vehicles and also that is cost effective or being responsible for imposing or not controlling costs that will not enable that service to continue at the standard required. As you know we are in year one of licence and the set up cost were estimated at £10,000, insurance being the main issue at an estimated cost of £8000, how can this continue? - **ABC Leisure Limited**