

Public Protection Partnership  
Environmental Health and Licensing.  
Wokingham Borough Council

Wokingham Borough Hackney  
Carriage Association.

Dear Sir/Madam,

**PROPOSAL TO AMEND THE CRITERIA FOR LICENSING OF VEHICLES**

Thank you for the opportunity to comment on the proposed amendments to the present criteria in regards to licensing of vehicles, fuel types and any additional suggestions for consideration.

Please find below the collective comments and suggestions of the WBHCA members and non-members alike who are wholeheartedly committed, through good ethics and good work practices, to the welfare and safety of the general public and therefore support any meaningful action that will enhance and reflect good ethics, good work practices, health and safety throughout the Hackney carriage trade.

**Proposal - Amend to remove from 2.2.1 (iii-x) and replace with the following:**

***From \*date TBC\*, new vehicle licences shall only be issued for vehicles which fall within the following Euro NCAP categories:***

***(i) Large Family***

***(ii) Executive***

***(iii) Small MPV***

***(iv) Large MPV***

***(v) Large Off Road 4x4***

It would be considerably helpful to have a list of vehicles that qualify for each of the above categories.

Advice provided by licensing team in regards to proposed purchase of a fit for purpose vehicle be in written format so as to eliminate confusion.

**Proposal - 2.2.2 Amend to remove and replace with the following:**

**All licensed vehicles (except for private hire vehicles with a dispensation) must meet the following requirements:**

***(i) Light transmitted through the windscreen must be at least 75%***

***(ii) All other windows both front and rear must allow at least 70% of light to be transmitted***

In regards to the proposed amendment the criteria should reflect current law as per below regarding, "**Motor Vehicles first used on or after 1 April 1985: The light transmitted through the windscreen must be at least 75%. The front side windows must allow at least 70% of light to be transmitted through them, there is no reference to rear side windows.**"

In the UK as in the EU, all new cars are certified as legal for sale under the **Whole Vehicle Type Approval** regimen that differs from Euro NCAP.

Therefore all vehicles sold on or after 1<sup>st</sup> of April 1985 with the the **Whole Vehicle Type Approval (WVTA)** certification in EU are fully compliance with current law including transmission of light.

All vehicles licensed by Wokingham Borough Council should adhere to the law including private hire vehicles, no avenue should be made available to flout any law including the transmission of light. By allowing dispensed vehicles special status is therefore wrong and contradictory to the VOSA guidelines and the WBC vehicle license policy. Excerpt from VOSA guidelines below;

**“How does excessively tinted glass affect road safety? - It restricts the driver’s vision, especially in dark conditions. This may prevent drivers from seeing other road users or pedestrians. It also prevents other road users and pedestrians from confirming through eye contact that they have been seen”**

VOSA – Vehicle & Operator Service Agency – Guidelines & Advice

What is excessively tinted glass?

Road Vehicles (Construction & Use) Regulations 1986 as amended specify the minimum levels of light that must pass through the windscreen and front side windows. The limits are:

Motor Vehicles first used before 1 April 1985: The windscreen and front side windows must allow at least 70% of light to be transmitted through them.

Motor Vehicles first used on or after 1 April 1985: The light transmitted through the windscreen must be at least 75%. The front side windows must allow at least 70% of light to be transmitted through them.

If the glass is tinted to a point whereby it lets through less light, then the vehicle does not meet legal requirements.

Which windows in the vehicle does this apply to?

The windscreen and the front side windows to either side of the drivers head.

How does excessively tinted glass affect road safety?

It restricts the driver’s vision, especially in dark conditions. This may prevent drivers from seeing other road users or pedestrians. It also prevents other road users and pedestrians from confirming through eye contact that they have been seen.

What is the purpose of the law?

The purpose of the law is to ensure the drivers’ ability to see the road is not excessively restricted by glass tint.

Legally where do I stand?

If you are the driver - - You must not drive a vehicle on the road with the windscreen or front side windows excessively tinted. You may also invalidate your insurance with this modification, particularly as the vehicle is likely to be illegal. If you are a tinting company - - You must not modify, or offer to supply, a part that when fitted to a vehicle means that it does not comply with Construction & Use Regulations. If you're selling a vehicle with extra tinting applied to the windscreen or front side windows - - The vehicle may now have glass that is darker than permitted by Construction & Use Regulations, in which case the vehicle should not be sold.

Why are tinted windows not included in the MOT test?

Excessively tinted glass is seen as a serious issue but one which currently affects only a small number of the 24 million vehicles tested annually. To include this item in the MOT test would require all 18,000 garages to incur expenditure on special test equipment and the time taken to carry out an MOT would increase. The MOT fee would have to be raised to cover the extra time and investment. This extra cost would affect all motorists - all for a small number of vehicles. With the current levels of offending, roadside enforcement is a better route as it targets the offenders while minimising the cost and inconvenience to compliant road users

Is this a nationwide campaign?

Yes. VOSA staff throughout the country has been issued with testing equipment. If the equipment is not available, a subjective assessment will be carried out. If the vehicle is considered dangerous to drive then an immediate prohibition may be issued.

**Proposal - 2.5.2 Amend to remove and replace with the following:**

**When making a Hackney Carriage vehicle application, a vehicle must be less than five years old from the date of first registration, unless the application is for the renew of a license. No Hackney Carriage vehicle licence will be issued for a vehicle that exceeds 10 years old from the date of first registration.**

The WBHCA members and non-members alike strongly feel the lowering of the license duration from 15 years from first registration to 10 years is not necessary; the existing life of HC license is adequate in meeting both the WBC and its licensees requirements, especially compared with likeness to neighbouring authorities.

Perhaps on the 10<sup>th</sup> year of first registration anniversary and every annual renewal of the HC Licence until its 15 year life of licence the HC licensed vehicle be required to undergo a comprehensive inspection provided by specialised motoring organisations such as the;

RAC <https://www.rac.co.uk/buying-a-car/vehicle-inspections>,

DEKRA <https://www.dekra-expert.co.uk/vehicle.inspections/book.a.vehicle.inspection>

or such like, **this, independent, process will better serve in providing an accurate assessment of the vehicle.**

**Proposal - Add new condition 2.5.4 as follows:**

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**2.5.4 In cases where a vehicle has done an abnormally low mileage and is in exceptional condition (see below), it may, on application, be granted an extension on the age limit. Any such application must be received in writing by the Licensing Team at least 3 months prior to the date upon which the vehicle reaches its age of vehicle expiry date. The vehicle may be subjected to a visual inspection. The vehicle owner will receive a decision in writing within 10 working days after the inspection. Any extensions granted may be subject to certain conditions.**

**Abnormally Low Mileage**

**The Council will not regard a vehicle as having travelled an abnormally low mileage in the following circumstances:**

- 1. A vehicle intended for normal private use with a mileage in excess of 200,000 miles, or**
- 2. A wheelchair accessible vehicle with a mileage in excess of 300,000 miles, or**
- 3. A private hire vehicle which meets the criteria to be licensed with a dispensation with a mileage in excess of 300,000 miles.**

**Exceptional Condition**

**A vehicle will not be regarded as in "exceptional condition" unless documentary evidence has been presented to the Council that the vehicle has been regularly serviced and maintained in line with the manufacturer's servicing schedule.**

**When considering the exterior and interior of the vehicle the following matters will be taken into consideration in judging if the condition is exceptional. A single item, depending upon the extent of damage or cosmetic appearance, will not necessarily result in refusal to extend the use of the vehicle but 2 or more items in all areas will require correction, replacement or repair for an extension to be granted.**

**Exterior of vehicle**

- 1. The exterior paintwork on the vehicle should not:**
  - a) shows signs of rusting**
  - b) be faded or show signs of mismatched paint repairs**
  - c) have 5 or more stone chips greater than 2mm in length in any direction**
  - d) have 8 or more stone chips of any size**
  - e) have any scratches, cracks or abrasions where the top layer of paint has been removed.**
- 2. The exterior bodywork of the vehicle should not:**
  - a) have 2 or more dents greater than 10mm in length in any direction**
  - b) have 4 or more dents less than 10mm in length in any direction**
  - c) have fittings that are missing, broken or damaged.**
- 3. Have wheels and wheel trims that have significant damage which detracts from the overall excellent condition of the vehicle.**

Protective Marking: Unclassified

4. **The vehicle must be submitted for inspection in a clean state such that an effective inspection is possible. Should the vehicle be submitted in an unclean state then the application shall be refused.**
5. **The engine compartment must not be in a dirty condition or have evidence of leaks including water, oil or hydraulic fluids.**

**Interior of vehicle**

6. **The seating and carpet areas of the vehicle shall not show signs of:**
  - a) **staining**
  - b) **damp**
  - c) **fraying or ripping of the material**
  - d) **seat covers that are loose or badly fitted.**
7. **The seats should provide sufficient support for comfortable travel and should not demonstrate excessive compression of the seating area or wear within the support mechanism.**
8. **Interior panels and fittings within the vehicle should not be damaged nor show excessive wear, or staining.**
9. **The interior of the vehicle should not have damp or other obnoxious smells.**

**2.6 Advertising**

No proposed changes

**2.7 Temporary Replacement Vehicles**

No proposed changes

**2.8 IVA**

No proposed changes

**2.9 Disabled Access**

**2.9.1 Vehicle Standards**

A Hackney Carriage Vehicle licence will not be issued (other than by way of renewal) to any vehicle, unless it is accessible for disabled persons. All vehicles subject to a Hackney Carriage Vehicle application and those Private Hire Vehicles which have been adapted or manufactured for disabled access must comply with the following standards in addition to those detailed in the paragraphs above;

- i. The vehicle must be able to accommodate a fully grown adult passenger **whilst seated** in their wheelchair (i.e. there must be adequate headroom for the passenger).

Protective Marking: Unclassified

**Abnormally Low mileage** – The WBHCA members and non-members alike are of the opinion that this will encourage the use of illegal practice of mileage tampering, which is actively pursued by rogue used car traders.

**Exceptional Condition**

No comment

**Exterior of Vehicle**

No comment

**Interior of Vehicle**

No comment.

The above proposal of new condition **2.5.4** may best be served by **one** proficient requirement alone in that on the 10<sup>th</sup> year of first registration anniversary and every annual renewal of the HC Licence the HC licensed vehicle be required to undergo a comprehensive inspection provided by specialised motoring organisations such as the;

RAC <https://www.rac.co.uk/buying-a-car/vehicle-inspections>,

DEKRA <https://www.dekra-expert.co.uk/vehicle.inspections/book.a.vehicle.inspection>

or such like. **This, independent, process will better serve in providing an accurate assessment of the vehicle.**

**Proposal - Amend to add the following to 2.9.1**

**All wheelchair accessible vehicles must be capable of accommodating an adult in a Dft reference wheelchair in the passenger compartment. A wheelchair space shall not be less than;**

**(i)1300mm measured in the longitudinal plane of the vehicle;**

**(ii)750mm measured in the transverse plane of the vehicle; and**

**(iii)1500mm measured vertically from any part of the floor of the wheelchair space;**

**Any entrance or exit which is intended to provide access for a wheelchair user shall have a clear unobstructed width of not less than 800mm.**

This proposal should be for any new to be licensed vehicle. The “Dft reference wheelchair” has no set specifications for use in licensed taxis, below is an example of the “Dft reference wheelchair” recent adaptation in its use in the private hire industry governed by TFL, a wide ranging area;

All vehicles on the new platform will fit a wheelchair of the standard reference wheelchair size. The dimensions of the smallest vehicles on the platform have a minimum internal space of - height: 1377mm width: 783mm and length: 1320mm.

The onus is clearly with Local Authority together with the cooperation of the licensees as to the smooth viable adaptation of DfT recommendations in regards to the wheelchair access issue.

## **The Department for Transport - Access for wheelchair users to Taxis and Private Hire Vehicles Statutory Guidance**

### **Vehicles that can be designated**

3.3 We want to ensure that passengers in wheelchairs are better informed about the accessibility of the taxi and PHV fleet in their area, confident of receiving the assistance they need to travel safely, and not charged more than a non-wheelchair user for the same journey.

3.4 The Act states that a vehicle can be included on a licensing authority's list of designated vehicles if it conforms to such accessibility requirements as the licensing authority thinks fit. However, it also goes on to explain that vehicles placed on the designated list should be able to carry passengers in their wheelchairs should they prefer.

3.5 This means that to be placed on a licensing authority's list a vehicle must be capable of carrying some – but not necessarily all – types of occupied wheelchairs. The Government therefore recommends that a vehicle should only be included in the authority's list if it would be possible for the user of a "reference wheelchair"<sup>1</sup> to enter, leave and travel in the passenger compartment in safety and reasonable comfort whilst seated in their wheelchair.

3.6 Taking this approach allows the provisions of section 165 of the Act apply to a wider range of vehicles and more drivers than if LAs only included on the list vehicles capable of taking a larger type of wheelchair.

3.7 The Government recognises that this approach will mean that some types of wheelchair, particularly some powered wheelchairs, may be unable to access some of the vehicles included in the LA's list. The Act recognises this possibility, and section 165(9) provides a defence for the driver if it would not have been possible for the wheelchair to be carried safely in the vehicle. Paragraph 3.10 of this guidance below aims to ensure that users of larger wheelchairs have sufficient information about the vehicles that will be available to them to make informed choices about their journeys.

### **Preparing and publishing lists of designated vehicles**

3.8 We want to ensure that passengers in wheelchairs have the information they need to make informed travel choices, and also that drivers and vehicle owners are clear about the duties and responsibilities placed on them.

3.9 Before drivers can be subject to the duties under section 165 of the Act, the LA must first publish their list of designated vehicles, and clearly mark it as 'designated for the purposes of section 165 of the Act'.

3.10 LAs should ensure that their designated lists are made easily available to passengers, and that vehicle owners and drivers are made aware. Lists should set out the details of the make and model of the vehicle, together with specifying whether the vehicle is a taxi or private hire vehicle, and stating the name of operator. Where possible it would also be helpful to include information about

the size and weight of wheelchair that can be accommodated, and whether wheelchairs that are larger than a “reference wheelchair” can be accommodated.

3.11 However, we recognise that some passengers in wheelchairs may prefer to transfer from their wheelchair into the vehicle and stow their wheelchair in the boot. Although the legal requirement for drivers to provide assistance does not extend to the drivers of vehicles that cannot accommodate a passenger seated in their wheelchair, we want to ensure that these passengers are provided with as much information as possible about the accessibility of the taxi and PHV fleet in their area.

3.12 We would therefore recommend that LAs also publish a list of vehicles that are accessible to passengers in wheelchairs who are able to transfer from their wheelchair into a seat within the vehicle. It should be made clear however that this list of vehicles has not been published for the purposes of section 165 of the Act and drivers of those vehicles are therefore not subject to the legal duties to provide assistance. Authorities may however wish to use existing licensing powers to require such drivers to provide assistance, and impose licensing sanctions where this does not occur.

### **Proposal - 2.9.2 Vehicle Type Approval**

#### **Amend to remove and replace with the following:**

**All vehicles that are designed to accommodate wheelchair users must have all modifications and adaptations, including all seats, seat belts and anchorages, retested to meet either the European Whole Vehicle Type Approval or the UK Low Volume Type Approval in the M1 category (evidence of this must be produced). Those vehicles which have not been “type approved” to the M1 category (e.g. conversions) must be presented with approved certification that the specific vehicle meets the requirements of that category. Vehicles may be inspected for suitability by an officer. It is recommended that prior to purchasing any new vehicle, advice be sought from the Licensing Team.**

This section of the proposal is unclear as to its application e.g. unconverted vehicles that presently possess UK Low Volume Approval, IVA, are they affected if so why?

### **ECWVTA - Commonly asked questions**

#### **Q1: What is EC Whole Vehicle Type Approval (ECWVTA)?**

ECWVTA is a system allowing a vehicle design to be "type approved" for sale, registration and entry into service across all member states in the EU without the need for further testing in each country. This will result in the creation of a single market by ensuring common vehicle standards.

From April 2009, legislation was extended to cover all new road vehicles such as buses, coaches, trucks, trailers (including caravans) **and certain special purpose vehicles such as wheelchair accessible vehicles (WAVs)**. The legislation will be phased in over the coming 5 years depending on vehicle category.

#### **Q2: Who will be affected by ECWVTA?**



The majority of businesses affected will be the manufacturers and converters of commercial vehicles, namely buses and coaches, goods vehicles and trailers. For a more comprehensive description of the vehicles affected please refer to the vehicle category definitions within the directive.

Two business sectors which will be particularly affected are body builders, i.e. those that take a chassis and build or modify a body of any description on it before selling it to the customer, and manufacturers of commercial vehicles imported from inside or outside Europe.

**Q7: What about manufacturers only wishing to sell within the UK?**

There are two separate national schemes for lower volume UK manufacturers. These are:

- National Small Series Type Approval (NSSTA)
- Individual Vehicle Approval (IVA)

The schemes are designed to maintain ECWVTA standards, whilst minimising compliance costs for low volume manufacturers, usually small to medium-sized companies.

However, unlike ECWVTA, these UK national approval schemes will not necessarily be accepted automatically by other EU member states. Producers who want to export products with national certification will have to apply directly to the Type Approval authority in the country to which they wish to export, although the Directive provides for processes to facilitate the mutual recognition of national Type Approvals.

**Q8: What else can you tell me about the different approval schemes?**

There are four different schemes:

1. ECWVTA is aimed primarily at manufacturers of vehicles and bodywork producing large numbers of the same vehicle type or product each year. It can be applied to complete, incomplete or completed vehicles. Achieving ECWVTA means the manufacturer can sell the product in any EU market without needing additional national tests in another EU member state. VCA is the designated UK type approval authority and can help in this area.

2. ECSSTA (EC Small Series Type Approval) has been created for low volume car producers only, and like full ECWVTA will allow Europe wide sales but with technical and administrative requirements that are more adapted to smaller businesses.

3. NSSTA (National Small Series Type Approval) is a UK national scheme for low volume manufacturers who intend to sell only in the UK. The advantages of NSSTA are a reduced CoP requirement, and reduction in administrative requirements. Like ECWVTA, once the design is approved, individual vehicles do not need to be tested

4. IVA (Individual Vehicle Approval) is a UK national scheme and the most likely route for those manufacturing or importing single vehicles or very small numbers. IVA does not require CoP, although most bodybuilders and converters will work with manufacturers to ensure there is no warranty compromise.

Under IVA, vehicles have to be inspected by the Driver and Vehicle Standards Agency (DVSA) in Great Britain or the Driver Vehicle Agency (DVA) in Northern Ireland.

## **Following are suggestions for future vehicle licence policy**

### **Fuel Types**

Example of Electric WAV;

<http://www.brotherwood.com/wheelchair-accessible-vehicles/electric-wheelchair-accessible-vehicle-nissan-env-200/>

Following are excerpts from Houses Of Parliament – Parliamentary Office Of Science & Technology

### **Overview**

- Electric vehicles (EVs) are more energy efficient during use than petrol or diesel vehicles, and produce less air pollution.
- The carbon emissions of an EV depend on how the electricity it uses is generated.
- Given the UK's current electricity mix, the carbon emissions due to driving an EV are comparable with the most efficient diesel cars, and are around 30% less than the average for new fossil fuel cars.
- Currently, the main barriers to uptake are cost (notably, battery cost), limited range between recharges, long recharge times and a lack of recharging infrastructure.
- A combination of industry regulation, pilot projects and consumer incentives is being used to encourage uptake in the UK.

### **Consumer Incentives**

Plans for a consumer subsidy for EVs from January 2011 were announced by the previous government. EVs which meet performance, reliability and safety criteria will be eligible for a 25% purchase price subsidy, up to a maximum of £5,000. In July 2010, £43m funding for the scheme was confirmed, with a review of the subsidy amount per car planned for March 2012. Tax measures designed to encourage the sale of lower emitting vehicles include Graduated Vehicle Excise Duty and Company Car Tax.

### **Requirements for EV Uptake**

#### **Vehicle Range**

Limited range (see Box 1) is seen as a barrier to consumer uptake of EVs. A major technological challenge for manufacturers is to increase range while keeping battery size and cost down. Range can also be increased using plug-in hybrid EVs (Box 1). PHEVs can complete journeys of up to 40 miles (60 km) in electric mode, but fossil fuels are used for longer journeys or when recharging facilities are unavailable. Journeys of less than 25 miles (40 km) account for 93% of car trips and 60% of car emissions in the UK.

### **2020 and Beyond**

Future EV numbers are difficult to predict and forecasts vary from 1-10% of cars in the UK by 2020. Different technologies may begin to compete for different market sectors. Countries with early EV markets may attract more industry investment (see Box 3). The UK has not set targets for vehicle numbers. However the Committee on Climate Change recently recommended aiming for 1.7 million EVs by 2020, as a step towards the UK's long term emissions reduction targets. <sup>3</sup> Given the length of time new vehicle technologies can take to become established, many stakeholders feel this level of uptake by 2020 is unlikely.

### **TFL Policy**

Under Transport for London (TfL) rules, all **new** black cabs from 1 January 2018 will need to be electric, or capable of producing zero emissions. Combined with an age limit for the cabs of 15 years, that means the last diesel ones should disappear from London by 2032.

Although the upgrade to a new set of wheels, the new all electric black cab, will set back London cabbies about £55,000.

### **Alternative and additional Proposals / Suggestions to the current Policy**

The WBC vehicle license policy should take in to consideration the affluent upmarket character and nature of the town and to portray that, as reasonably possible, in the HC & PH vehicle licensing policy so as to reflect the desired image and for the end user to have a befitting experience.

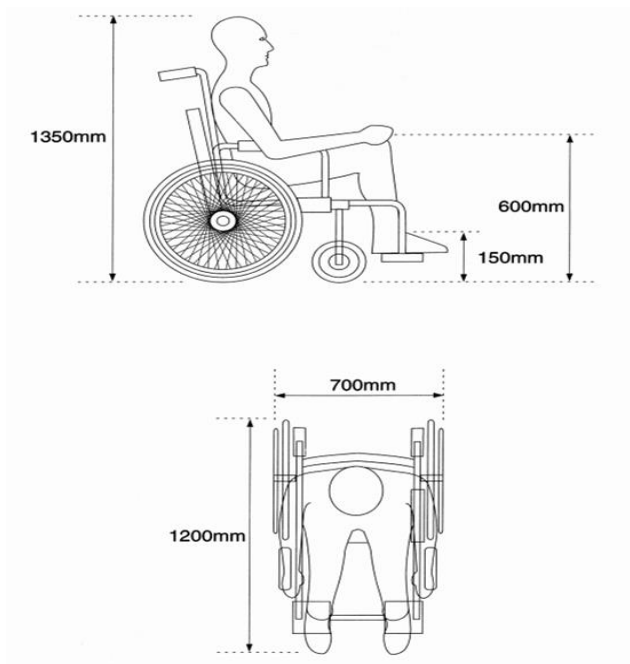
The WBHCA members and non-members alike urge the WBC to take this opportunity to overhaul, rectify, renew and clarify the existing confusing and openly interpretable vehicle licensing policy, to an exemplary standard.

That the currently HC licensed vehicles be phased out by the 15 year life of license condition presently applicable to them, mechanically dependant. The following **new** conditions of license be introduced in addition to the present policy, date to be agreed, that;

- Any new to be licensed converted wheelchair accessible vehicle/s (WAVs) must possess an EC Whole Vehicle Type Approval (ECWVTA) certification.
- A vehicle can only be licensed for the **first time** as a hackney carriage that is either hybrid, fully electric, or capable of producing zero emissions” **as per the above TFL policy**. To encourage uptake and appeal ability some form of concessions might be necessary for the initial period of enforcement.
- A vehicle must meet the following specification so as to accommodate a “reference wheelchair” as per the DfT recommendations and have a minimum internal wheelchair space of - height: 1370mm width: 783mm and length: 1320mm.
- All licensed HC vehicles be transferable to a DD badge holder or operator.
- Allow HC Vehicles operating on Henley Regatta week to charge same or similar tariff to South Oxfordshire HC Vehicles.
- Smaller engine sizes should be incorporated as the new modern engines are far more potent than their older predecessors, as highlighted in the following article from the Economist;

<https://www.economist.com/science-and-technology/2015/12/10/the-incredible-shrinking-machine>

DfT Guideline Reference Wheelchair dimensions.



The preceding suggestions, we hope, are foreseeable future proof, will eliminate the presently laborious; costly, and confusing and often difficult to implement policy conditions that are readily open to wide and varied interpretations.

#### **Examples of Local Authority Taxi and Private Hire Licensing Policy and Highlights**

##### **Brentwood Borough Council - Wheelchair Accessible Vehicles**

##### **Passengers with wheelchairs**

All licensed taxis in Brentwood must be able to carry a wheelchair folded and stored in the boot.

Some of these are also able to carry an occupied wheelchair within the vehicle.

The list of designated vehicles below are all capable of carrying some, but not necessarily all, types of occupied wheelchairs.

This list has been designated for the purpose of section 165 of the Equalities Act 2010.

**The list was last updated on 16th May 2018.**

HACKNEY CARRIAGE HCV059 FORD TOURNEO 848 CARS

HACKNEY CARRIAGE HCV191 PEUGEOT EUROBUS 848 CARS

HACKNEY CARRIAGE HCV083 MERCEDES VITO MR BUCKLEY

HACKNEY CARRIAGE HCV226 FORD TRANSIT MR EARL

HACKNEY CARRIAGE HCV094 PEUGEOT EXPERT E7 MR FROST

HACKNEY CARRIAGE HCV243 RENAULT TRAFIC MR HODGSON

HACKNEY CARRIAGE HCV074 VOLKSWAGEN TRANSPORTER MR PERRY

PRIVATE HIRE PHV113 MERCEDES V CLASS MR BROWNE

All our licensed vehicles can be checked using our [Licensing Public Access](#) system.

Any complaints of refusal to carry a wheelchair chair should be emailed to [licensing@brentwood.gov.uk](mailto:licensing@brentwood.gov.uk)

Following url's are a recent drafting of a local authority's Hackney Carriage and Private Hire Licensing Policies 2018

[https://www.scambs.gov.uk/sites/default/files/south\\_cambridgeshire\\_district\\_council\\_taxi\\_policy.pdf](https://www.scambs.gov.uk/sites/default/files/south_cambridgeshire_district_council_taxi_policy.pdf)

<https://www.swale.gov.uk/assets/Licensing/Policies/Hackney-Carriage-and-Private-Hire-Licensing-Policy-2018-2023.pdf>

Driver dress / appearance code perhaps should be considered.

The opinions of its users, or potential users, especially the numerous elderly residents who have expressed the need for the saloon type vehicles be available at the town ranks for ease of access to get in and out of them.

The WBHCA wishes to resolve all matters amicably by cooperating fully with WBC so as to bring about a smooth and trouble free coexistence that will benefit all concerned, our vision is for the WBC to understand the effects the proposed changes will bring about to the economic wellbeing of our members and to lessen the negative impact as much as possible yet attain the changes that are inevitable to take the HC trade in Wokingham to the desired level.

Yours Sincerely

REDACTED - FABO WBHCA

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