



This matter is not a Key Decision within the council's definition and has not been included in the relevant Forward Plan

Report of Executive  
Director, Development,  
Environment and Culture

**REVIEW OF TAXI LICENSING IN BARNSELY**

**1. Purpose of Report**

- 1.1 The purpose of this report is to inform Members of the outcome of the fundamental review of hackney carriage and private hire services provided by the Council
- 1.2 To seek approval for a series of recommendations that will ensure high quality and cost effective services to the taxi trade and general public in Barnsley

**2. Recommendations**

**It is recommended:**

- 2.1 **The Council regularises its original adoption of Part II of the Local Government (Miscellaneous Provisions) Act 1976 for the whole of the Metropolitan Borough of Barnsley;**
- 2.2 **That Members adopt the licensing conditions for Private Hire Drivers, Private Hire Vehicles, Hackney Carriage Vehicles and Private Hire Operators as attached at Appendix C(i), C(ii), C(iii), C(iv) and C(v);**
- 2.3 **That Members adopt the Hackney Carriage and Private Hire Driver Convictions Policy as attached at Appendix D(i);**
- 2.4 **That Members approve the code of conduct document attached at Appendix D(ii);**
- 2.5 **That taxi licensing application processes be revised to deliver the changes listed at Appendix E, including:**
- **Drivers to be given the option of one or three year licences**
  - **Three year licences to be tied in with the current Criminal Records Bureau (CRB) renewal timescales**
  - **Dual licences to be offered to all applicants**
  - **The current requirement for drivers to undertake the Driving Standards Agency's (DSA) test will be reviewed, including whether there are suitable alternatives through the use of local DSA driving instructors.**

- Operator licences should be granted for a period of 5 years, in line with operator CRB checks.
- 2.6 That the vehicle licensing and testing process be revised to deliver the changes listed at Appendix E, including:**
- A risk-based approach to vehicle testing be introduced
  - Vehicle testing should no longer be limited to Smithies Depot, but should allow for vehicles to be tested at suitable Vehicle and Operator Services Agency (VOSA) test stations.
  - MOT test certificates will be issued rather than the current certificates of compliance.
- 2.7 The Trade Liaison Group (TLG) should continue with clear terms of reference, including:**
- Meetings to take place bi-monthly
  - An annual schedule to be produced detailing regular matters that need to be considered by the TLG and outlining when co-opted members of the group will be invited to meetings – e.g. Finance Officer to present annual accounts.
  - All terms of reference, policies, procedures, conditions and processes to be captured in a Taxi Licensing Manual, appropriately controlled and available to all stakeholders.
  - Regular attendance by key stakeholders such as the Police, Smithies Depot Manager, Highways Services and Planning Services, ideally on a twice yearly basis.
- 2.8 The BMBC website will be fully utilised as a vehicle for communications between the Council, the trade and the public, particularly for consultation and to report important items of information.**
- 2.9 The Licensing Board should continue to hear taxi licensing matters,, and the operation and timeliness of the appeals process be monitored for 12 months and performance be reported to Performance Review Panel.**
- 2.10 The current limit on Hackney Carriages should be maintained, subject to further review in 2014**
- 2.11 Taxi licensing policies, procedures, processes, and the analysis of costs and fees, will be reviewed every three years, unless significant changes occur to legislation or relevant government guidance.**
- 2.12 Fees will be reviewed at the earliest opportunity, once the final recommendations resulting from this report are delivered. This should take place in time to implement a revised fee structure for 2014/15.**

### **3. Introduction**

- 3.1 Following an objection to the BMBC accounts by the taxi trade, the District Auditor recommended in his letter dated 23<sup>rd</sup> August 2011 that a fundamental review of the taxi trade in Barnsley be undertaken.
- 3.2 The Authority accepted these recommendations at the full Council meeting on 3<sup>rd</sup> November 2011 and agreed that they would be considered, and a review carried out, over a period of 9 months or possibly longer if circumstances dictated. It was agreed that regular reports will be taken back to both the Audit Committee and Licensing Board.
- 3.3 Firstly, the Council confirmed that it has not over-recovered fees from the taxi trade in recent years and therefore there is no need to consider any refunds.
- 3.4 Following this, a series of meetings have been held between officers from BMBC and the taxi trade (the Taxi Liaison Group – TLG) to discuss how the review of taxi services should be organised and delivered.
- 3.5 The TLG quickly agreed that the best way to deliver a meaningful taxi review that would meet the requirements of the District Auditor, and would result in improvements to service delivery, would be to agree a framework within which the review would take place.
- 3.6 To this end, eight key themes were agreed, with a delivery deadline of September 2012. The eight key themes were put together based on key concerns expressed by the TLG, and are as follows:
- 3.6.1 Theme 1 - Review of Licence Conditions
- Hackney Carriage Vehicles
  - Private Hire Vehicles
  - Private Hire Drivers
  - Private Hire Operators
- 3.6.2 Theme 2 - Review of Policies
- Enforcement
  - Convictions Policy
  - Establishment of Code of Conduct
- 3.6.3 Theme 3 – Taxi Partnership Working
- Trade Liaison Group
  - Taxi Watch
  - Barnsley Voice
- 3.6.4 Theme 4 - Review of Application Process
- Application Procedure
  - Testing Requirements

- Three Yearly Licences
- Dual Licences
- Delimiting (linked to Law Commission Review)

#### 3.6.5 Theme 5 - Vehicle Testing

- Frequency
- Venue
- Charges

#### 3.6.6 Theme 6 - Fee Review

- Driver
- Vehicle
- Operator

#### 3.6.7 Theme 7 - Governance

- Accounting/Reporting Methods
- Taxi Policy

#### 3.6.8 Theme 8 - Physical Infrastructure

- Hackney Carriage Ranks
- Private Hire Drop-off Zones
- Use of Bus Lanes

3.7 The first two themes, based around licence conditions and licensing policy were carried out utilising expert legal advice, both internally and externally.

3.8 Due to the complexity of the review, the tight timescales and the desirability of building in a degree of independence, the remaining six themes were led by an external consultant, commissioned by the Council via the appropriate procurement processes.

3.9 The Council fully accepts that taxi drivers and operators are important, valued and legitimate local businesses, and must do all that it can to support and encourage them as a critical provider of transport services in the borough. It must also recognise that it has a statutory role in ensuring that taxis are safe and well regulated, providing reliable and reputable service to the public. These two things are not mutually exclusive, but there has to be a balance struck.

3.10 Due to the nature of the matters being considered in this report, it was taken to the General Licensing Regulatory Board on the 16<sup>th</sup> January 2013..

#### **4. Consideration of alternative approaches**

4.1 The review of taxi services is as a direct result of a formal recommendation by the District Auditor following an objection to the Council's accounts, and a resolution of full Council in November 2011

- 4.2 Key to the District Auditor's recommendation was that the review should be in full consultation with trade and this is what has happened. Where possible, the views and suggestions of the taxi trade have been taken into account in formulating the recommendations contained in this report.
- 4.3 The recommendations in this report have also been put together following consultation with experts both internal and external to the Council, and following the conclusions of an external consultant who was commissioned to report back after reviewing current service provision within the authority.
- 4.4 Where appropriate, an assessment has been, or will be, made of the operational and financial implications of implementing each recommendation and it is felt that all the recommendations are reasonable and achievable. The Council has taken the view that rather than defend a position purely on the fact that it is "always the way we have done it", it has taken on board many of the concerns expressed by the trade in the spirit of "why not?". There is a need to recognise that technology and the Council's changing strategies and financial situation has meant that all processes need to be reviewed and brought up to date.
- 4.5 Where there has been a failure to reach agreement with the trade, this has been reflected in the minutes of TLG meetings and/or in the supporting documentation to this report.

## **5. Proposal and justification**

- 5.1 The conditions relating to the granting of taxi licensing have been revised, covering hackney carriage drivers and vehicles, private hire drivers and vehicles, and private hire operators. These conditions have been subject to formal legal scrutiny by the Borough Secretary and have been put together following full consultation with the TLG. It is proposed that the conditions attached as Appendix C are adopted by the Council. It should be noted that if Members adopt all, or even some, of the other recommendations contained in the report, then conditions are likely to need further revision. For example, if the proposal to remove the requirement for all vehicles to have a fire extinguisher is accepted, then this will need to be reflected via a revision to the vehicle conditions.
- 5.2 Similarly, the convictions policy which guides officers and Members on assessing whether a hackney carriage or private hire driver is a fit and proper person to drive. This policy has been revised in partnership with external expert legal advice (specialist Licensing Barrister) and in full consultation with the TLG. It is proposed that the convictions policy at Appendix D is adopted by the Council
- 5.3 A Code of Conduct / Service Standards document has also been developed, again with external expert input and in full consultation with the TLG. This document sets out the standards expected of the taxi trade in its day to day provision of services to the public and should provide a clear framework for all concerned to manage reasonable expectations. It is proposed that the document attached as Appendix D is adopted by the Council.

5.4 Key Theme 3 is about Partnership Working with the taxi trade. Following the completion of the work commissioned by CTS Traffic and Transportation, and full consultation with the trade, the following are proposed:

- Develop current relationships between the taxi trade, the Licensing team and other council services such as Highways, Planning and Transportation Policy to reflect the need for the trade to be included in any discussions and consultation relating to the physical infrastructure of the Borough – road routing, hackney ranks, private hire pick up and drop off points and so on. This will provide the opportunity for a full and frank discussion with trade and enable them to make their voice heard as the borough is developed, particularly in the town centre.
- Where appropriate, any planning applications that could involve the need for taxi provision as part of the development, e.g. supermarkets and other commercial developments, should have these needs reflected.
- The provision of private hire and hackney carriage services should be included in any development of the Town Centre Area Action Plan.
- The taxi trade have asked that they should be allowed to use bus lanes in the borough. In order that this request be properly considered, the trade must take it upon themselves to commission a review of bus lane usage and what the advantages might be in allowing taxis to use them.

5.5 Key Theme 4 covers the application process itself and the following are proposed:

- All application forms for taxi licensing should be the same whether they are on-line or hard copy. This would be in line with current Council policy of encouraging on-line application and payment. This will make it easier for applicants to enter the trade.
- Driver licence renewals should be tied in with CRB driver checks – i.e. every three years. This would remove the current rush every summer when all drivers renew at the same time. Although this will entail considerable further work to ensure that changes to systems, processes and financial arrangements (e.g. setting suitable fees) are taken into account, this would ease the pressure on the trade and officers. It is intended that these new arrangements would be implemented by 1st April 2013, with an appropriate review of fees thereafter. Drivers renewing would be offered one to three year options, depending on the date of their CRB renewal.
- Dual licences (i.e. able to drive hackney carriages and private hire vehicles) should be issued, unless the applicant specifies a single licence. This makes the process simpler to administer and removes any concerns over drivers “migrating” from hackney to private hire or vice versa.
- Council checks on DVLA driving licences will be by direct web link to the DVLA. This will remove the need for drivers to submit their original documentation when renewing their licences, and will enable officers to

carry out periodic checks on drivers remotely. This will go some way towards ensuring that the risk of “false” licences and unlicensed drivers is eliminated, improving public safety.

- Operators should be offered 5 year licences. Again, this is in line with national guidelines and will ease the pressure on operators and officers.
- The issue of drivers migrating between one licence and another – i.e. hackney to private hire and vice versa – has been a contentious one, particularly the current policy of treating such a migration as a new application. The Council suggests that where a migrating driver meets the Council’s driver convictions policy, and has a good record with the Council, the need for a DSA test should be removed, which is consistent with not requiring a new medical or CRB check. It will still be a new application, with the appropriate fee, but will not require all the documents usually associated with a new application..
- The DSA test should be reviewed. The Council is unconvinced by claims from the trade that appointments with DSA test centres are hard to come by, but would be prepared to consider a reasonable alternative – e.g. advanced driving tests using existing driving instructors.
- The current knowledge test should be retained, subject to regular review by the Licensing team.
- The Council will prepare comprehensive guidance on the expected timescales for the respective licensing application requirements – CRB checks, Medicals, DSA driving tests, theory tests etc. This will provide an up front indication of what applicants can expect, although the Council cannot be held responsible for delays associated with other agencies.

5.6 Key Theme 5 is related to vehicle testing and the following are proposed:

- Frequency of vehicle checks will be revised on a risk based approach, utilising failure statistics and making more use of ad-hoc roadside checks and short notice checks using the expertise retained by the vehicle engineers at Smithies Depot. This will mean that vehicles which consistently pass their tests are less likely to get inspected or tested than those which don’t. This seems a fairer approach all round.
- Allowing other MOT test stations to carry out vehicle testing – this will need more work in terms of implementation and would, if accepted, be progressed through the TLG. This would provide more freedom and flexibility to the trade in where they go for testing, but will need further work regarding implementation as the Council needs reassurance that vehicles are properly tested and safe. Current VOSA arrangements are such that there is high confidence that MOT test stations of a suitable, or “green”, status are already well regulated.
- This will mean providing an MOT test certificate after each check as opposed to the current Certificate of Compliance. This will mean that all

vehicles will always have an up to date MOT certificate, removing any confusion associated with certificates of compliance, which are occasionally not recognised as valid MOTs.

- Reporting accidents – a simple report form will be developed that will need to be sent into the Group Leader. Accidents must be reported and this will make the process simpler and easier, and will allow officers the opportunity to inspect vehicles and reassess driver competency.

5. Key Theme 6 relates to a Review of Fees and the following are proposed:

- The Council maintains that it has not over-recovered fees in the past and there are no refunds applicable (see previous analysis)
- Once the changes in this report are agreed and implemented, a review of their impact on costs, and therefore fees, will be carried out. The independent consultant has suggested that any changes to fees may be implemented for the beginning of 2013/14, but some of the suggested changes will take time to implement in themselves, and then be impact assessed, so it is more likely that any changes to fees will be introduced in April 2014

5.8 Key Theme 7 relates to Governance and the following are proposed:

- Current recommendation from Consultant is that consideration of officer panels be delayed pending agreement on other more pressing matters of governance – TLG meetings, lines of reporting, clear process map for licensing matters, including where and to whom individual issues go for decision
- The Trade Liaison Group (TLG) should continue with clear terms of reference, including:
  - Meetings to take place bi-monthly
  - An annual schedule to be produced detailing regular matters that need to be considered by the TLG and outlining when co-opted members of the group will be invited to meetings – e.g. Finance Officer to present annual accounts.
  - All terms of reference, policies, procedures, conditions and processes to be captured in a Taxi Licensing Manual, appropriately controlled and available to all stakeholders.
  - Regular attendance by key stakeholders such as the Police, Smithies Depot Manager, Highways Services and Planning Services, ideally on a twice-yearly basis.

This puts relationships between the trade and the Council, and other stakeholders, on a clear and solid footing, ensuring that the current good working relationships continue into the future.

5.9 Key Theme 8 relates to Physical Infrastructure, and has clear links with Key Theme 3 (Partnership Working). Following the completion of the work



commissioned by CTS Traffic and Transportation, and full consultation with the trade, the following are proposed:

- Taxi needs and requirements will be considered in any future development proposals for the borough, in particular the Town Centre.
- Eldon Street is a particular issue and the taxi trade must be consulted on any changes to taxi rank provision, in particular how it interacts with other ranks on Midland Street and Regent Street
- Planning applications should be considered in light of any potential need for hackney carriage / private hire provision, particularly where commercial developments such as supermarkets and night clubs are concerned.
- A licensed vehicle access strategy should be developed to encompass the proposals above, involving officers and trade.
- Any licensed vehicle access strategy needs to dovetail with the Town Centre Area Action Plan.

## **6. Implications for local people / service users**

- 6.1 One of the main drivers for undertaking a review of taxi licensing, apart from the fact that the District Auditor recommended it, was to improve things for the trade, the service and, ultimately, the public. The intention is to make the taxi licence application process simpler and easier, with more choice available to the trade.
- 6.2 There will be a review of service costs and expenditure once the outcomes of this review are implemented, which may have an impact on the fees paid to the Licensing Service, but this will be reported back to Members at the appropriate time, likely to be in advance of the budget setting process for 2014/15.

## **7. Financial implications**

- 7.1 Consultations on the financial implications have taken place with representatives of the Acting Executive Director of Finance.
- 7.2 Some of the recommendations detailed in the body of the report will see a streamlining of the administrative processes within the Licensing Section and therefore will impact on the administrative costs attributable for recovery. This would also see a potential fall in the level of administrative staffing required within the licensing team.
- 7.3 There may however be a case for increased enforcement around general vehicle licensing enforcement e.g. roadside vehicle checks and operator checks. This would see a potential increase in the level of enforcement costs attributable for recovery and the requirement for additional resources around enforcement.
- 7.4 Any impacts on the overall costs attributable for recovery and the knock on effect on the level of charges levied via Taxi Licensing will be assessed as all

the accepted recommendations are bedded in throughout 2013/14. The impact of these potential changes on licensing charges and the levels of fee income received will be subject to a further report, and be ready for implementation by April 2014.

- 7.5 Recommendations included in Key Theme 5 around frequency of testing and the taxi trade being permitted to use other VOSA approved MOT stations, will see proposed changes to vehicle testing arrangements at Smithies. This could potentially impact on Vehicle Testing income, but would depend on how quickly these proposals could be implemented as the Council needs reassurance that vehicles are properly tested and safe.
- 7.6 However, ad hoc roadside and short notice vehicle inspections carried out by licensing enforcement officers and mechanical engineers from the Smithies Test station could generate additional income, as all vehicles selected will be sent to Smithies for testing. This may help offset any reduction in vehicle testing income detailed at 7.5.
- 7.7 As with the Taxi Licensing the full impact on Vehicle Testing income will not be certain until the full impact of the proposals are realised. Any impacts will be monitored through 2013/14 and will be subject to a further report in line with the review of Taxi licences and be ready for implementation by April 2014.

## **8. Employee implications**

- 8.1 There are no employee implications at this stage. As is mentioned at Paragraph 7, a future review of resources will take place following implementation of any approved recommendations. Any employee implications will be assessed and reported at that stage.

## **9. Communications implications**

- 9.1 Planning and Regulatory Services have been working closely with the trade, via the TLG, throughout the entire review, so they should be up to speed with any changes falling out of this report. Having said that, changes will be communicated to the trade as and when they are implemented, and appropriate adjustments will be made to the website and the information contained therein.
- 9.2 There is little impact on the public, so no significant communication issues in this regard.

## **10. Consultations**

- Taxi Trade Liaison Group
- Environmental Services
- Planning
- Chair and Vice Chair of Licensing Board and formal consideration by the Board at its meeting on 16<sup>th</sup> January 2013.

**11. Glossary**

- TLG – Trade Liaison Group
- VOSA – Vehicle and Operator Services Agency
- DVLA – Driver and Vehicle Licensing Agency
- DSA – Driving Standards Agency
- CRB – Criminal Records Bureau

**12. List of Appendices**

Appendix C Taxi Licensing Conditions:

- i. Hackney Carriage Vehicles
- ii. Private Hire Vehicles
- iii. Private Hire Drivers
- iv. Private Hire Operators

Appendix D Driver Convictions Policy

Appendix E Full List of Recommendations

**13. Background Papers (Available from Officer Contact, Regulatory Services)**

Final Report from CTS Traffic and Transportation

Key Theme Reports A-F from CTS Traffic and Transportation

2011 Hackney Demand Review

Office Contact: Simon Frow	Telephone No: 772541	Date: 17.01.13
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Financial Implications / Consultation ..... Date: .....

Consultations have taken place with representatives of the Acting Executive Director, Finance



**Detailed Recommendations for Cabinet Report “Review of Taxi Licensing in Barnsley”**

1. The Council formally adopts Part II of the Local Government (Miscellaneous Provisions) Act 1976 for the whole of the Metropolitan District of Barnsley and makes no distinction between one area and another for the purposes of licensing hackney carriage and private hire services.
2. That the Licensing conditions for drivers, operators and vehicles attached as Appendix 3 be adopted, subject to amendment as operational changes are implemented
3. That the Driver Convictions Policy and Statement of Standards attached as Appendix 4 are adopted
4. The outcomes of this report are not be reviewed for a period of three years, unless there is an urgent need to do so, e.g. a change to legislation, or changes are required as the proposals in this report are implemented.
5. That the Licensing application process be brought up to date to deliver a smoother and more effective service for the trade, and to reflect the need for a greater focus on enforcement:
  - a. Only one version of each application form, administered and controlled electronically via the website
  - b. Re-introduction of a vehicle licence application form
  - c. Robust document control
  - d. Drivers to be offered a choice of one or three year licences
  - e. Three year licences to be tied into the CRB renewal process for private hire or dual driver licences.
  - f. Dual licences (i.e. to drive both hackney carriages and private hire vehicles) to be granted to all applicants, with an opt-out option
  - g. Late renewals will no longer be required to undertake a DSA test, unless records suggest that one is required, but they will be required to pay a new application fee
  - h. On-line access to the DVLA database to be implemented, removing the need for applicants to submit their original driving licence on application or renewal

- i. Operators licences to be granted for 5 years, in line with Operators' basic CRB renewal dates
  - j. The Council will prepare comprehensive guidance on the expected timescales for the respective licensing application requirements – CRB checks, Medicals, DSA driving tests, theory tests etc
  - k. The current requirement for drivers to undertake the DSA driving test will remain, subject to consideration of suitable alternatives, e.g. the use of local driving instructors
6. That the vehicle licensing and testing process be changed as follows:
- a. A risk-based approach to vehicle testing to be introduced, reflecting pass and failure rates for individual vehicles and moving towards ad hoc vehicle testing rather than a strict number of tests per year based on the age of the vehicle. There will be a minimum of one test per year for all vehicles.
  - b. Vehicle testing should no longer be limited to Smithies Depot. An approved list of Barnsley MOT test stations will be produced, whereby MOT test certificates will be issued rather than the current Certificates of Compliance. Additional vehicle conditions required by the Council, such as vehicle signage, will be checked through regular monitoring by the Council
  - c. Accidents involving licensed vehicles must be reported to the Licensing Team. A simple process and report form will be introduced and communicated to the trade.
  - d. Tinted glass to be allowed provided it meets VOSA standards
  - e. Fire extinguishers will no longer be a vehicle condition
7. The Trade Liaison Group should continue reflecting the following terms of reference:
- a. Meetings to take place bi-monthly
  - b. Responsibility for implementing recommendations in this report as appropriate
  - c. Main focus to be on operational issues of concern to the Group
  - d. An annual schedule to be produced detailing regular matters that need to be considered by the group and outlining where possible when co-opted stakeholders will be invited, e.g. an annual presentation of budget figures

- e. All terms of reference and policies, procedures, conditions and processes to be captured in a Taxi Licensing Manual, appropriately controlled and freely available to all stakeholders
- f. Regular attendance by key stakeholders such as the Police, Smithies Depot Manager, Highways and Planning, possibly on a twice yearly basis.

#### 8. Consultation and Communication

- a. It is accepted that the taxi trade is a key consultee in many development proposals within the borough. While it is not within the gift of Regulatory Services to direct how consultation is carried out by other services, it will facilitate linkages with the trade wherever possible, including the ITA
- b. The BMBC website will be used as a vehicle for communicating with the trade, and will be used to direct the trade to consultations that may be relevant, and to important items of information.

#### 9. Officer Panels

The Licensing Board should continue to carry out hearings into driver fitness and other taxi matters. Officer panels will be considered in 12 months time after a fuller assessment into the effectiveness of the current arrangements, and following the full implementation of the outcomes of this report.

#### 10. Delimiting the Number of Hackney Carriages

Following the Demand Survey carried out in 2011, the current limit on Hackney Carriages should be retained. This will be reviewed in August 2014 when the next Demand Survey is due and when the outcomes of the current Law Commission review into taxi licensing is complete

#### 11. Licensed Vehicle Access

The Council and the Trade will work together to ensure that the interests of the trade are represented when any developments are proposed in the borough, particularly where there are physical infrastructure issues, for example hackney ranks and drop off/pick up points.







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Mr William Ward  
Council Governance Officer  
Barnsley Metropolitan Borough Council  
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Our Ref: DBW  
Your Ref:  
Date: 27 January 2013  
Please ask for: David Wilson

**By email only to:**  
**WilliamWard@barnsley.gov.uk**

Dear Mr Ward,

**Review of Taxi Licensing in Barnsley  
Council Meeting  
Thursday, 28 February 2013 at 10.30am**

I act on behalf of Barnsley Private Hire Association, Barnsley Hackney Carriage Association, Alliance Trade Association and Blueline Taxis (Barnsley) Ltd.

On behalf of my aforementioned clients, I would be obliged if you would kindly ensure this letter is placed before the Mayor and Members of Council at their earliest convenience.

My clients and I would like to take this opportunity to publicly express our thanks and appreciation for all the work that has been done to date in connection with the review of taxi licensing; and to respectfully ask Council to approve the recommendations detailed in the officer report.

Together with a few trade representatives, I will be attending the meeting in order to show our appreciation and to observe the proceedings.

Yours sincerely,

**David B Wilson**  
Licensing Consultant, Mediator and Trainer

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