

**Briefing Paper for Licensing Committee**  
**Proposals re Changes to Taxi Licensing Policies**

Consultation question	Nos of respondents	Review of respondents comments	Recommendations	Reasons for Recommendations	Comments
<p>Qu 1a</p> <p>Do you think the maximum age of vehicles when first licensed should be reduced from the current age of 7 years</p>	<p>Yes 62</p> <p>No 235</p> <p>N/A 12</p>	<p>The majority of respondents (existing licence holders) thought the entry age limits for vehicles shouldn't be reduced. Expense of newer vehicles was given as the most common reason for this view. Some respondents took the view that if the vehicle passes the test its fit for purpose. Reasons given for supporting a reduced entry age limit included safety and comfort, one respondent stated that older vehicles downgraded the service offered to the customer</p>	<p><b>1. That the entry age limit for licensed vehicles be reduced from 7 to 5 years to take effect 3 months from adoption of the recommendation</b></p> <p><b>2. That the hackney fare tariff be reviewed so as to enable additional costs to be recovered by the licensed trade</b></p> <p><b>3. That an exceptional condition policy be introduced to be implemented at the same time as any age limit requirement. The wording of any such policy to be approved by committee prior to introduction</b></p>	<p>(i) A newer licensed fleet will in general terms improve the quality of the licensed fleet. A 3 month lead in time will allow time to source a vehicle</p> <p>(ii) The removal of the 7 year entry age limit will prevent vehicles previously licensed in other authorities but now having exceeded those age limits being licensed in Rossendale. Such vehicles have usually been subject to extensive wear and tear</p> <p>(iii) It is recognised that on rare occasions a vehicle may not meet the age limit requirements but be in exceptional condition. The council will introduced an exceptional</p>	

				<p>condition policy that facilitates the licensing of such vehicles</p> <p>(iv) the additional costs of purchasing newer vehicles is recognised and so the Council will review the hackney carriage fare tariff to provide some recompense to the trade . In relation to PHV the Council does not control the tariffs and therefore it is a business decision for Operators as to how such costs are recovered</p>	
<p>Qu 1b</p> <p>Do you think the Euro emission standard should be used as a parameter to determine the Councils age limit policy?</p>	<p>Yes 81</p> <p>No 202</p> <p>N/A 25</p>	<p>Few specific comments were received in respect of this issue. Response nos 299 from Mr David Wilson representing Rossendale’s Taxis association provided information on this issue. the comments made by Mr Wilson include fact</p>	<p><b>4. That Euro emission standards are not used as a primary determinant for Rossendale’s vehicle age policy.</b></p> <p><b>5. A licence condition be introduced in respect of vehicles to the effect that</b></p>	<p>(i) An age limit policy will by nature provide protection to prevent old emission standard vehicles being used</p> <p>(ii) A proposed policy/ licence condition regarding retrofitted</p>	

		and opinion . Other respondents question whether the Euro emissions standard will apply post Brexit	<p><b>a licensed vehicle cannot be retrofitted with an engine of a lower euro emission standard than that which was in place at the time of manufacture</b></p> <p><b>6. that consideration be given to incorporating emission standard requirements within a review of the overarching licensing policy</b></p>	<p>engines will protect the Euro emission standard</p> <p>(iii) The Council has no control over when euro emission standards will be introduced. If Emission standards are to be used as the basis of an age limit policy this could ultimately result in older vehicles remaining on the fleet for considerable periods of time</p>	
<p>Qu1c</p> <p>Do you think consideration should be given to changing the maximum age limit at which a vehicle should be licensed</p>	<p>Yes 106</p> <p>No 185</p> <p>N/A 17</p>	<p>The responses received were largely general comments in respect of age limits as opposed to why a 10 year age limit may / may not be appropriate for licensed vehicles. As per question 1a the majority of concerns from the licensed trade appear to be in respect of expense</p>	<p><b>7. That the maximum age limit at which vehicles can be licensed remains as per current policy i.e. 10 years for saloon cars and 12 years for wheelchair accessible vehicles</b></p> <p><b>8. That the maximum age limit for vehicles is</b></p>	<p>(i) The proposal to reduce initial entry age limits from 7 to 5 years will incur an additional cost to the trade. This cost could be offset by a review of the fare tariff. The impact of the costs can be reduced by keeping the existing maximum age limit in place , this also facilitates longer term</p>	

		<p>associated with more stringent age limits</p>	<p><b>further reviewed 12 months after any change in the general age limit policy</b></p>	<p>planning by the trade for the purchase of replacement vehicles</p> <p>(ii) A 12 monthly review will allow officers to gather data in respect of vehicle age/ standards (i.e. vehicle test and inspection data) that will further inform a future review</p> <p>(iii) there was no overriding support or comments made which would indicate change is needed at this time</p> <p>(iv) The proposed introduction of an exceptional condition policy will provide some flexibility in terms of age limits</p>	
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<p>Qu1d</p> <p>Do you think a different age limit should be applied to wheelchair accessible vehicles</p>	<p>Yes 81</p> <p>No 209</p> <p>N/A 18</p>	<p>Very few comments were made specific to age limits on wheelchair accessible vehicles (WAV). It is noted that the majority of respondents thought the WAV age limit policy should be the same as saloon cars despite clearly listing cost of vehicle as being the main reason for not supporting a newer vehicle fleet . it is recognised that WAV are more expensive than saloon cars . A comment was received suggesting that adapted vehicles may be more susceptible to corrosion</p>	<p><b>9.That licensed vehicles over 10 years of age remain subject to 4 monthly testing per annum i.e. 3 vehicle tests per year</b></p>	<p>(i) there was no reasoned argument put forward as to why a change in policy would be appropriate/ required</p> <p>(ii) The provision of 4 monthly testing for vehicles over 10 years of age provides more regular checks to ensure that standards are being maintained on older vehicles</p>	
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<p>Qu 2</p> <p>Do you think that the Council should introduce a uniform livery for Rossendale licensed hackney carriage vehicles?</p>	<p>Yes 68</p> <p>No 228</p> <p>N?A 12</p>	<p>The responses indicate that the majority of the licensed trade respondents do not support a uniform livery for vehicles. The most commonly cited reason being cost. A number of respondents indicate that the current door signs / plates and roof signs are sufficient to distinguish the vehicle from private hire. Mr Wilson (299 ) in his response provides information on what he perceives to be the challenges in relation to the issue of vehicle livery . A differing view is expressed in response (301) from Rotherham MBC</p>	<p><b>10. That the Council adopts a standard block colour livery for hackney carriage vehicles. The taxi trade is offered a further opportunity to express a colour preference.</b></p> <p><b>11 That any approved livery be introduced 3 months after approval of the requirement to all new vehicles applications. Existing licensed vehicles to remain as per current requirement whilst the vehicle remains licensed.</b></p> <p><b>12. That the size of the door signs be increased by XX% to assist in identification of the vehicle</b></p> <p><b>13 That the roof signs to be affixed to hackney</b></p>	<p>(i) a standard block colour livery will assist in identification, the argument re costs are not accepted as the requirement will only be applied to newly licensed vehicles.</p> <p>(ii) Vehicles suspended due to accident damaged can have the suspension lifted once the vehicle has been repaired, however vehicles whose licences have been revoked would not be eligible for relicensing unless they complied with livery requirements. Current policy allows change of vehicle on an existing licence such change of vehicle would be subject to livery requirements</p> <p>(iii) The increase size of door signs will assist in</p>	
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			<p><b>carriages be provided by Rossendale BC and be of a standard design and printed with Rossendale Licensed taxi. To take effect from xxxx</b></p> <p><b>14 That private hire vehicles granted a new licence as opposed to a renewal cannot be livered in the same colour as the colour adopted for hackney carriage vehicles, this recommendation to take effect 1 month after approval of this recommendation</b></p> <p><b>15 That a licence condition be introduced That approved company door signs be affixed to the rear passenger doors of licensed vehicles. The company/ operator door signs to be of a minimum size XX by XX and a maximum size of XX by XX. Hackney carriages working solely from the</b></p>	<p>identification</p> <p>(iv) The provision of standardised roof signs will assist in identification and clearly identify the vehicle as a licensed Rossendale hackney carriage</p> <p>(v) That the requirement for rear door signs on licensed vehicles be required in regards to assisting in the identity of the vehicle. Vehicles working purely on hackney carriage ranks would not be required to provide such signage as passengers would have taken the journey from a rank.</p>	
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			ranks/ stands to be exempted from this requirement		
<p>Qu3</p> <p>Do you think the Council should require all Rossendale licensed hackney carriage vehicles to be wheelchair accessible</p>	<p>Yes 39</p> <p>No 257</p> <p>N/A 12</p>	<p>The main objections to this proposal were on the basis of cost.</p> <p>Two respondents provided information indicating that when they had a licensed WAV it was rarely used to transport passengers travelling in wheelchairs, several comments were received indicating that some wheelchair users prefer not to travel in a wheelchair and prefer to access a saloon vehicle . It is also noted that Dept for Transport best practice guidance suggests that</p>	<p><b>16 That the Council does not pursue a policy in respect of a mandatory requirement for hackney carriages to be WAV</b></p> <p><b>17 That the Council incorporates disability awareness training and assessment into the driver policy knowledge test</b></p> <p><b>18. that the Council works with trade representatives to explore further initiatives</b></p>	<p>(i) Having regard to proportionality and the financial investment required the Council does not currently have enough evidence to support a mandatory requirement for all hackney carriages to be WAV</p> <p>(ii) The provision of disability awareness training and assessment will improve knowledge amongst the licensed trade</p> <p>(iii)Removal of maximum</p>	



		<p>local authorities should licence a range of vehicles (ref para 27).</p> <p>One respondent provided comments in support of mandatory disability awareness training, it is acknowledged that the response was provided by a person with a business interest in this area , however the comments are deemed relevant</p>	<p><b>for improving availability of WAV within the licensed fleet (HC and PH)</b></p>	<p>age limit requirements at time of first licence will encourage the provision of such vehicles</p> <p>(iv) Further work is required to ensure that Rossendale’s taxi services (HC and PH) can meet the demand of disabled service users</p>	
<p>Qu4</p> <p>Do you think a mandatory requirement for CCTV in all Rossendale licensed vehicles should be introduced?</p>	<p>Yes 151</p> <p>No 140</p> <p>N/A 17</p>	<p>A small majority of respondents supported mandatory CCTV in licensed vehicles with driver and passenger safety given as the main reason for such support. A response from Rotherham MBC (301) explains the mandatory requirement now in place at Rotherham. In addition the response at 298 details why Rossendale should consider itself to be in an exceptional position and require</p>	<p><b>19. That the Council introduces a requirement for mandatory CCTV in licensed vehicles</b></p> <p><b>20 Any specification for CCTV is subject to approval by the Committee</b></p> <p><b>21 That the implementation date for CCTV in licensed vehicles allows sufficient time for an approved specification approved installers and ICO considerations to be</b></p>	<p>(i) The Council supports the view of the majority of respondents</p> <p>(ii) The Council considers that CCTV does offer both driver and passenger protection</p> <p>(iii) The timescales for implementation should ensure that all parties have adequate time to prepare for the</p>	

		<p>CCTV. Mr Wilsons response at 299 provides views regarding CCTV installations but suggested that the Council should “sit on the fence” at the current time.</p>	<p><b>facilitated. A date of 6 months from the adoption of the recommendation is proposed</b></p> <p><b>22 That any requirement for CCTV in licensed vehicles be applied to new applications and vehicle renewal applications wef 6 months following adoption of the recommendation</b></p> <p><b>23. That if requirements for CCTV in licensed vehicles are approved consideration be given to an exemption in respect of vehicles that will not be eligible for relicensing due to age limit requirements</b></p>	<p>requirements</p> <p>(iv) the comments regarding costs are noted but it is also noted that the cost of CCTV would be a tax deductible expense.</p> <p>(v) Analysis of licensing units records shows that between 30-40 complaints are received each month regarding licensed drivers (this excludes complaints about plying for hire). CCTV will assist in the investigation of some complaints</p>	
<p>Qu5 Do you think the Council</p>	<p>Yes 183</p>	<p>A majority of respondents supported mandatory requirements re DBS</p>	<p><b>24 the Council</b></p>	<p>(i) There was majority</p>	

<p>should require all licensed drivers to maintain subscription to the online DBS update service with a requirement that a full enhanced DBS would only be required following a change in status in the DBS certificate</p>	<p>No 109 N/A 13</p>	<p>update subscriptions , reasons given included , cheaper in the long term, easy for the council to access, enables annual check, no waiting time for DBS to come back, perfect and easy, keeps records up to date , means driver get licence quicker , good for public safety . those not supportive provided the following reasons, not necessary, costs too much, should be voluntary</p>	<p><b>introduces a mandatory requirement for an enhanced DBS together with online DBS subscription for all new and renewal applicants wef 3 months from the date of adoption</b></p> <p><b>25. The Council will require DBS online subscription is maintained for licensed drivers failure to maintain subscription may result in action being taken against the licence</b></p>	<p>support for the introduction of mandatory online DBS subscription</p> <p>(ii) the process is quicker and cheaper than 3 yearly enhanced DBS checks (where no material change has occurred)</p> <p>(iii) the process will allow the Council to undertake appropriate checks on the DBS status throughout the 3 year driver licence period</p>	
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<p>Qu6</p> <p>Do you think that all licensed drivers should be required to meet the Rossendale basic standard in numeracy and English literacy (this requirement is currently in place for all new applicants but consideration is being given to all existing licensed drivers to be required to meet this standard on renewal</p>	<p>Yes 113</p> <p>No 184</p> <p>N/A 11</p>	<p>The majority of respondents (taxi trade) did not support the introduction of basic skills assessments for renewal drivers. Reasons provided included,</p> <ul style="list-style-type: none"> <li>● Not required for renewal drivers in other LAs</li> <li>● Cost - money making for LA</li> <li>● Concern re testing capacity/ delays</li> <li>● Penalises old drivers</li> <li>● Unfair on people who can communicate verbally but not read well</li> <li>● Appropriateness of the test- drivers failing test will lead to drop in supply</li> <li>● Should be grandfather rights for experienced</li> </ul>	<p><b>26 That existing licenced drivers be required to satisfactorily complete the basic skills assessment prior to the renewal of their hackney carriage/ private hire drivers licence. Implementation date for licences due to renew wef 1 June 2017</b></p>	<p>(i) it is essential that licensed drivers are able to communicate effectively with their customers. The basic skills assessment level is currently set at secondary school entry level</p> <p>(ii) A lead in time is suggested in order to allow any current driver adequate time to develop skills if they feel that this is needed</p> <p>(iii) additional provision will be made available to ensure there is no delay in accessing assessments</p> <p>(iii) the wording of recommendation 1 is such so as to prevent early applications in order to avoid compliance with the</p>	
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		<p>drivers</p> <p>Those supporting the requirements stated</p> <ul style="list-style-type: none"> <li>● Will improve driver standard</li> <li>● Will assist in communication with customers with disabilities</li> <li>● Many drivers have previously applied for Rossendale licence because there was no basic skills assessment. Nos of licensed drivers with poor skills</li> </ul>		<p>requirements, applications can be made early but would still be subject to the skills assessment requirement if the exiting licence expires after 31 May 2017</p> <p>(iv) it is accepted that other local authorities do not require renewal applicants to pass a basic skills assessment . However most other Councils have had basic skills assessment in place for a number of years and therefore the majority of their existing drivers have already passed such an assessment</p> <p>(v) written literacy skills are deemed necessary in terms of reading instructions, providing written receipts on requests etc.</p>	
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				<p>(vi) The Council does not perceive supply of licensed drivers being an issue, the Council currently has over 4000 licensed drivers and over 500 applicants currently waiting to take the basic skills assessment. All new applicants are made aware of the Councils intended use policy</p> <p>(vii) the cost of the basic skills assessment will be subject to a formal tendering process to ensure that best value is attained</p>	
<p>Qu 7</p> <p>Do you think hackney carriage proprietors</p>	<p>Yes 82</p>	<p>This proposal did not have support from the majority</p>	<p><b>27 A licence condition be imposed on hackney</b></p>	<p>(i) the introduction of this measure would be to</p>	

<p>should be required to maintain an accurate record of the use of their vehicles in order to assess whether the vehicle is predominantly being used in Rossendale</p>	<p>No 210 N/A 12</p>	<p>of the trade . it was clear that a number of respondents were drivers working out of the Rossendale area and were concerned about the intended use policy. Comments in support of the proposal thought it would support the intended use policy. Comments against the proposal included</p> <ul style="list-style-type: none"> <li>● 30 mile radius is sufficient on intended use</li> <li>● No other councils do this</li> <li>● Easy to provide fake records</li> <li>● Extra burden on drivers</li> <li>● Difficult to comply with at times of peak demand</li> </ul>	<p><b>carriage proprietors licences to the effect that a record of all journeys be recorded</b></p> <p><b>28 That initially compliance with intended use policy on licensed vehicles be intelligence led and partnership working with other Local Authorities including inspection of operator records</b></p>	<p>predominantly support the intended use policy. The Council requires journey logs to demonstrate where the vehicle is predominantly working</p> <p>(ii) partnership working with other local authorities and Rossendale private hire operators to identify where Rossendale Hackneys are primarily undertaking prebooked work should be further explored/ developed,</p>	
<p>Qu 8 There is currently no</p>		<p>In reviewing the</p>	<p><b>29 That vehicle</b></p>	<p>(i) It is accepted that the</p>	

<p>requirement for vehicle proprietors to demonstrate their fitness. Do you think vehicle proprietors licensed by Rossendale Council who are not currently licensed drivers should be required to obtain a basic disclosure</p>	<p>Yes 124 No 165 N/A 19</p>	<p>comments associated with this question it was clear that a number of respondents were confused, reference to fitness was assumed to be medical fitness and many comments made ref to driver related matters as opposed to vehicle. A number of respondents did however make the point that it is the driver who comes into contact with the passengers not the vehicle proprietor. Others thought this would ensure public safety but did not explain how this would be achieved. A comment was received that this was in accordance with TPCA 1847 section 43 but it is unclear how this applies as this section relates to the duration of a vehicle licence.</p>	<p><b>proprietors who are not currently licensed drivers are subject to a basic disclosure and a statutory declaration wef 3 months from the date of adoption</b></p> <p><b>30 That the taxi licensing policy is amended to be clear on the action that will normally be taken where defects are found on a licensed vehicle or where application forms have provided inaccurate information for example on intended use</b></p>	<p>driver has the public interface with the customer</p> <p>(ii) A basic disclosure would reveal unspent criminal convictions. A statutory declaration would detail all convictions. The basic disclosure is completed by a third party ie disclosure Scotland. . Information provided on these two documents would assist the council in determining the application as the council would have information in respect of an applicant’s criminal history and any previous behaviour which may suggest the applicant could undermine public safety</p> <p>(iii) the most common area for concern in</p>	
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				<p>respect to vehicles is the standard of maintenance. The taxi licensing policy should make it clear the circumstances that will normally result in the revocation /or suspension of a vehicle licence.</p> <p>(iv) Information on vehicle application forms regarding the intended use of vehicles is also proving to be inaccurate</p>	
<p>Qu 9</p> <p>Do you think the Councils current policy in respect of tinted windows in licensed vehicles should remain as current</p>	<p>Yes 195</p> <p>No 95</p> <p>N/A 18</p>		<p><b>31. There is no proposal to change current policy on tinted windows</b></p>		
<p>Qu 10 a</p> <p>Do you think that as part of Rossendales driver application process applicants should be required to satisfactorily complete a locality knowledge test</p>	<p>Yes 89</p> <p>No 207</p> <p>N/A 12</p>	<p>The majority of respondents were not in favour of a locality knowledge test, licence holders in particular did not support this . Where there was support for a knowledge test it was</p>	<p><b>32 That a local geographical knowledge test be introduced in respect of new applicant drivers and at renewal for existing licenced drivers (requirement to pass the knowledge</b></p>	<p>(ii) it is accepted that sat navs and other forms of technology can greatly assist in route planning , but there are occasions when local knowledge is required, technology fails, road traffic accidents</p>	

		<p>largely in respect of new applicants, many licence holders stated that existing drivers would already have the knowledge. Sav Navs and technology were stated by several respondents as the reasons for not requiring local topographical knowledge. Those in support of a wide scale introduction of local knowledge test tended not to be licence holders</p>	<p><b>test at next renewal no requirement to resit the knowledge test at subsequent renewal)</b></p> <p><b>33 That the knowledge test for new applicants takes effect 3 months after approval for new applicants and 6 months after approval for renewal applicants</b></p>	<p>passenger requesting an alternative to the most direct route etc.</p> <p>(ii) Many respondents indicated that existing drivers already have the local knowledge and therefore should be exempt . If drivers have the knowledge they will have little or no chance of failing the test</p> <p>(iii) The knowledge test will work in tandem with intended use policy for the hackney carriage trade</p> <p>(iv) A 6 month lead in time offers the opportunity for persons to develop/ enhance local topographical knowledge</p>	
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				(v) Although the majority of respondents from the licensed trade did not support knowledge testing no comments/ responses provided any overriding reason not to introduce such tests.	
<p>Qu10 b</p> <p>Do you think any locality knowledge test should apply equally to both hackney carriage and private hire drivers licences</p>	<p>Yes 94</p> <p>No 203</p> <p>N/A 11</p>	See response at 10a	See response at 10a	See response at 10a	
<p>Qu 10 c</p> <p>Do you think any locality knowledge test should apply to both new applicants and existing drivers upon renewal</p>	<p>Yes 37</p> <p>No259</p> <p>N/A 12</p>	See response at 10a	See response at 10a	See response at 10a	
<p>Qu 11</p> <p>Do you think Rossendales Councils licensing policy should be reviewed having regard to the</p>	<p>Yes 96</p> <p>No 190</p>		<b>34 The Licensing policy be amended to reflect any changes introduced</b>	<p>(i) Self-explanatory</p> <p>(ii) For the purposes of clarity it is important that applicants understand the</p>	

<p>implications and trends seen as a result of the deregulation Act 2015</p> <p>Do you think Rossendale Councils intended use policy should be reviewed</p>	<p>N/A 22</p>		<p><b>as a result of this review</b></p> <p><b>35 As a matter of urgency to be considered alongside these proposals, the Council will incorporate within the policy , the process to be adopted for dealing with new applications from existing licensed drivers who wish to apply for another type of drivers licence e.g HCD to PHD licence</b></p> <p><b>36. Any future review of private hire licensing will consider the issue of intended use</b></p>	<p>process that will be applied if/ when they apply for the second type of driver licence i.e. HCD applying for PHD licence</p> <p>(iii) In recent months Rossendale has seen a dramatic increase in the number of licences issued in respect of the private hire trade a review of private hire policies is required to ensure that the policies are fit for purpose in terms of current practice and the legal framework</p>	
<p>Qu 12</p> <p>Do you think Rossendales Guidelines to Convictions Policy should be reviewed</p>	<p>Yes 117</p> <p>No 174</p> <p>N/A 17</p>	<p>Opinions were divided but the Council had already commenced a review of the convictions policy in 2015 and this was yet to be finalised.</p>	<p><b>37 That the 2015 review of the convictions policy be completed. That the Greater Manchester Councils conviction policy be utilised as a template. The policy to detail how</b></p>	<p>(i) the Greater Manchester Convictions Policy to be used as a template in recognition of the significant cross border trade that exists between Greater Manchester and</p>	

			<p><b>conduct issues from other countries are to be considered</b></p> <p><b>38 That the convictions policy be reviewed annually by officers and any suggested amendments brought back to the committee for consideration</b></p>	<p>Rossendale</p> <p>(ii) A regular review of the policy will ensure that the policy reflects appropriate standards with aim for parity across the region</p>	
<p>Qu13</p> <p>Rossendale Council proposes to introduce a Code of good Conduct for licensed drivers . Do you think this would be useful / appropriate</p>	<p>Yes 168</p> <p>No 127</p> <p>N/A</p>	<p>The comments received demonstrate a lack of understanding by some respondents. The majority were supportive of code of conduct but there was lack of clarity regarding its status or consequences of none compliance .</p>	<p><b>39 That a code of conduct be included within the taxi policy identifying the standards expected of a licensed driver whilst undertaking work as a taxi driver</b></p>	<p>(i) a code of conduct provides a transparent overview of the standards expected of a licensed driver. Knowledge could be assess via the taxi driver policy knowledge test</p>	
<p>Qu14</p> <p>Rossendale Council currently requires all driver applicants to satisfactorily completed the Taxi driver DSA test .</p>	<p>Yes 151</p> <p>No 142</p> <p>N/A</p>	<p>This question became superfluous during the consultation period as the DSA announced that it would not be continuing</p>	<p><b>40 That the Council produces a specification for a practical driving assessment and produces a list of approved</b></p>	<p>(i) The practical taxi driving assessment is in place in over 200 local authorities and is seen as integral to the fit and</p>	

<p>The Council has been requested to consider approval of alternative provision of a driving standards assessment. Do you think this is appropriate</p>		<p>to offer the taxi driver assessment after 31 Dec 2016 . The consultation responses were mixed and once again some misunderstanding re the question, the following comments are highlighted</p> <ul style="list-style-type: none"> <li>● Standards the same across all suppliers</li> <li>● Anything that speeds up the process is welcome</li> <li>● Drivers with PSV/ HGV licences should be exempt</li> </ul>	<p><b>suppliers, it will be for applicants to choose which supplier to use. The specification and implementation to be introduced without delay ideally before 1 Jan 2017.</b></p>	<p>proper test for drivers</p> <p>(ii) The specification is required to ensure all assessments are of the same minimum standard.</p>	
<p>Qu15</p> <p>As part of the review, licence fees and tariff cards will also be considered. These reviews will be considered in accordance with legal requirements and any proposals will be subject to consultation in</p>					

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accordance with the statutory framework at the appropriate time, However please provide any initial view/ comments below					
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