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Joanne Boyle  
Licensing Team Leader  
Trafford Council  
Trafford Town Hall  
Stretford  
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Date 18<sup>th</sup> November 2013

Dear Joanne,

I am writing to you in relation to the proposal to adopt interim licensing measures for your taxi fleet at the forth coming Public Protection Sub-Committee meeting. This letter outlines the thinking of The London Taxi Company (LTC) on this issue as well as updating the council on the latest developments within LTC

The London Taxi Company has been working with regulators for 77 years to ensure an effective taxi service that can meet the needs of the community. The announcement, therefore, by Manganese Bronze Holdings Plc, the former owners of the LTC, in October last year that it was intending to appoint administrators came as a shock to large parts of the taxi industry.

In the letter from Bindmans asking for a review of taxi licensing policy in Trafford the position of LTC was stated as one of the primary reasons for holding a review as the commercial failure of the company may have led to the collapse of the taxi fleet in Trafford. With the purchase of LTC by Geely UK Ltd in February, I can now assure you that this is no longer the case and the future of the company is more secure than it has ever been. Not only have Geely committed to the maintenance of LTC's traditional place in the Greater Manchester taxi market generally and Trafford in particular but they have also announced a massive investment program of over £100 million in the short term to develop a new range of TX vehicles that can meet Trafford's needs in the 21<sup>st</sup> century.

None of this would be possible, however, without Trafford Council's commitment to internationally recognised standards that ensure an excellent taxi service that provide the basis for investment in the trade. The provision of black cabs on Trafford's streets gives the city a degree of international credibility that was instantly recognised in Shanghai and ensures that the city is a prime location for investment. We believe that your existing licensing conditions ensure that the residents of Trafford are provided with a taxi service that meets the needs of the widest section of the community and ensures that the council discharges its statutory obligations under the Equalities Act.



We do, however, agree with Allied vehicles that these conditions should be reviewed to ensure that they continue to meet the needs of Trafford's residents and the legal obligations placed on the council. Periodic reviews of council policies are good practice and we welcome the ability to show how Trafford's licensing system is arguably the best in the world.

That said we reject the proposal by Allied Vehicles that Trafford adopt interim licensing conditions that would see the E7 licensed as a taxi ahead of a full review of the council's licensing regime. We feel that their request is akin to placing the cart before the horse as there is no way of being able to identify either the benefits or liabilities of the adoption of the vehicle before the review. So in line with Allied's expressed concerns, we feel, therefore, that any proposed consultation should be wide ranging, in depth and examine all aspects of the current licensing system to test the validity of Allied's case.

At the heart of this review should be an examination of the impact on public safety to any changes in the current system not only to passengers but to road traffic as Trafford's ranks and current taxi fleet is designed to be able to perform tight u-turns that are not possible in an E7. To assess this properly an in-depth examination of the utility of the turning circle requirement must be undertaken. Public recognition of hackney carriages and the prevention of cross boarder hiring will also need to be examined to ensure that only licensed Trafford taxis operate within the council's jurisdiction. Given the importance of tourism to the Borough due to international and national venues we feel this is an important consideration for Trafford. The needs of the disabled community also need to be assessed and this assessment must take into account not only wheelchair users needs but those of the ambulant disabled community as well. A comparative examination of the features of various vehicles should be undertaken in relation to their utility for disabled passengers as well to determine their benefit.

The proposed interim measures will impact on all of these areas and the consequences of adoption are unknown. The only sensible decision is to reject this proposal but accept the call for a full review of the council's policy where by all issues can be assessed properly and any decision made can reflect the needs of Trafford.

We would also like to highlight the recent licensing review in Manchester that encapsulates the problems that Trafford would encounter if it adopted these interim measures. Under pressure from Allied Vehicles, Manchester Council adopted the same interim measures that Trafford is being asked to adopt in December last year ahead of a planned licensing review. The results of this review were placed before the licensing committee in July and it was decided that Manchester would not only retain its existing conditions but build on them. The overwhelming majority of councilors found the existing licensing conditions to be beneficial to the city and its residents.

Allied challenged this decision and officers were forced to bring the issue back to the committee three weeks later with the recommendation that the interim measures be adopted as the new standard. The reason for this was that legally the council could not now prevent the licensing of the E7 as the vehicle had been licensed as a taxi for over six months and the trade had a legitimate expectation that this



would continue. So Manchester's councilors had to accept a new licensing system that they did not support or feel provided the service that Manchester residents needed.

The lesson for Trafford is clear, if the committee adopts these interim measures at its next meeting it has essentially agreed a new licensing framework for the Borough which will not be legally amendable even if the proposed review finds that it significantly impacts public safety and disabled access. This is why we say that the only correct procedure is to have the review first and then contemplate any changes based on the evidence.

We, therefore, feel that your licensing conditions should be retained in the current form until the completion of your review.

Yours faithfully

**Julian Francis**  
**Government Affairs Manager**  
**The London Taxi Company**