

LICENSING COMMITTEE

7 SEPTEMBER 2012

REPORT OF HEAD OF PUBLIC EXPERIENCE

A.1 - HACKNEY CARRIAGE VEHICLES – LIVERY PROPOSALS

(Report prepared by Ian Taylor, Mike Gibson-Davies and June Clare)

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To provide members of the Licensing Committee with (a) more information about the consultation exercise (b) an update on recent developments (c) legal advice in the light of what has happened (d) a risk assessment of the different options open to Members and (e) different livery designs for the front side doors of taxis.

EXECUTIVE SUMMARY

At its meeting on 1 November 2011 (Minute 18 refers), the Licensing Committee resolved to set 14 acceptance criteria for hackney carriage and private hire vehicles. One criterion was that newly licensed vehicles be white with the bonnet and boot/rear panel coloured in TDC's corporate green and the Council's crest (not full logo) displayed on the front doors of the vehicle. The Minute records the setting of an inception date of 3 January 2012.

After that meeting, one of the private hire drivers drew the Council's attention to the judgment of the Newcastle Crown Court in a successful appeal against the imposition of a livery condition by Durham City Council. A copy of the judgment was provided. The court decided in that case that the licensing authority had not provided adequate reasons for imposing the condition.

The Council's Legal Officers were therefore consulted. They advised that it would be prudent for licensing officers to research the various criteria in the judgment and to submit a written report to the Committee which fully considered the Council's proposed livery requirement in the light of these and all other relevant criteria. This was intended to strengthen the Council's position in the event of an appeal against the livery requirement.

The Licensing Committee met again on 21 June 2012, considered another report and resolved (amongst other things) to proceed with the livery requirement for hackney carriage vehicles, that a suitable logo is incorporated on front side door panels and set a new inception date of 1 October 2012. At that time, the final details of the livery requirement had not been agreed and the report and Minute made no reference to the mechanism for imposing the livery requirement.

After that Committee meeting, a number of taxi drivers raised strong objections to the livery requirement. Written representations were made to the Council's Chief Executive, seeking to challenge the research and reasoning in the officer report (see e-mail in Appendix A).

A meeting held on 16 July 2012, at the request of representatives of the taxi trade in Tendring and officers from Public Experience, requested officers to put to the Licensing Committee for consideration a single livery colour option, preferably silver. Livery options for front door side panels are set out in Appendix B. At the end of the meeting, a number of drivers said they intended to challenge the Committee's decision to impose a livery

requirement by appealing to the Magistrates' Court.

The National Private Hire Association (NPHA) wrote to the Council on 20 July 2012, asking for clarification of the Council's intentions.

An appeal in the North East Essex Magistrates' Court against the Council's livery decision was lodged by NPHA on behalf of a taxi operator in the Tendring District. At the initial hearing on 24 August 2012, the appeal was adjourned until 26 October 2012. If the livery requirement is imposed as originally anticipated, it is thought likely that this appeal will proceed and that it could well be followed by many others. As matters stand at present, this would be expensive for the Council, irrespective of outcome, and could delay or defeat Members' intentions for the foreseeable future.

On the other hand, it may be that with further consultations, matters can be resolved by agreement. On balance, it is recommended that this option is the more expedient one and would be a more effective means of ensuring that Members' intentions are implemented.

RECOMMENDATION

It is RECOMMENDED that the Committee notes the contents of this report, in particular the legal section, and the representations of the taxi drivers, and decides which of the following options to pursue:

- (i) proceed broadly in accordance with the original decision subject to whatever clarification and minor amendments officers advise are appropriate in order to effect proper implementation: or**
- (ii) to decide that officers will undertake a further consultation exercise on the original proposals and the suggestions from the taxi trade and that officers will then report back to the Committee on the outcome.**

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

The proposed revision of the acceptance criteria for licensed hackney carriages in the District supports the objectives in the Council's Corporate Plan and proposals for promoting tourism and reducing crime.

FINANCE, OTHER RESOURCES AND RISK

Finance and other resources

Apart from the financial implications set out below, there are no direct financial implications to the Council arising from the decision to adopt a logo for the side panel of Hackney Carriage vehicles. The Legal Section below contains a risk assessment in respect of potential appeals and legal challenges against the licence condition for a liveried taxi fleet and associated financial risks.

Risk

The objections raised by drivers following the Committee decision on 21 November 2011, the written representations of objection sent to the Council's Chief Executive on 28 June 2012, the NPHA letter dated 20 July 2012 (see below and copies in Appendix A) and the appeal made to the North East Essex Magistrates' Court demonstrate that there is the likelihood of at least some appeals if the Council simply proceeds with the livery requirement as originally envisaged.

The latest legal advice suggests that these risks are considerable and would probably result in significant cost to the Council as well as delaying the effective implementation of the liveried hackney carriage requirement. The legal advice is therefore that the best way forward is to carry out more consultation and research and then to bring a further report back to this Committee in due course with a recommendation of how best to implement the liveried taxi requirement.

LEGAL

Consultation Process

The consultation process thus far consists of the following: first a letter (copy in Appendix A) dated 5 September 2010 was sent to some 390 drivers, giving them 3 weeks within which to respond. Less than 20% responded. The consultation was reported to the Licensing Committee meeting on 1 November 2011. Only 12 of those who responded agreed with the livery requirement, but the report does not state what percentage of those who agreed were hackney carriage drivers. It would appear from the consultation that only 3% of all drivers supported the decision. Experience has indicated that the courts will be much more sympathetic if the Council can demonstrate that its consultation exercise was thorough and diligent.

On 1 November 2011, the Licensing Committee (LC) decided to set 14 acceptance criteria for hackney carriage and private hire vehicles, including livery with an inception date of 3 January 2012. The officer report to that meeting reported a consultation response from less than 20% of the drivers. The decision included no mechanism for implementation and gave no express (but only an implied) authority to officers to implement the livery requirement. The LC met again on 21 June 2012 and considered a report based on only limited information. The formal decision rehearsed elements of that information and then resolved to proceed with the livery requirement, i.e. that a suitable logo is incorporated on front side door panels and set a new inception date of 1 October 2012. The Minutes of that meeting incorrectly state that the LC decision on 1 November 2011 relate to [only] hackney carriage vehicles.

The July 2012 edition of the TDC Licensing Service "Taxi News includes the following two paragraphs:

"Livery Fleet I would like to inform you that following Members decision on 21 June 2012, the Livery fleet has been agreed and will be coming into place from 1 October 2012. All new vehicles registered with TDC will need to be white in colour with a green bonnet and boot and under 5 year of age. You can keep all current vehicles until they are 10 years old, these do not have to be liveried.

Anyone who wishes to appeal against this decision will need to apply to a Magistrates Court before 7 August 2012. Please note, if you do appeal and your appeal is unsuccessful, Tendring District Council will seek to recover all costs involved."

There is no reference in any of the Committee Minutes to a 5 year requirement.

On 20 July 2012, the National Private Hire Association (NPHA) wrote to the Legal Services Manager, seeking clarification of the above assertions made in the Taxi News (see Appendix A). NPHA's website indicates that they represent hackney carriage and private hire drivers. The letter refers to a meeting of three of NPHA's members personally with the Council on 16 July 2012 "to ascertain whether the council's decision was adopted as policy

or as a condition of the licence” and goes on to say “They were subsequently informed that it is a policy – which of course may only be challenged in the Administrative Court within 90 days of the decision having been taken.”

On 8 August 2012, the Council received notice of an appeal by Paul Barry against “the decision of Tendring District Council concerning a new condition in relation to all hackney carriage licences” with an initial hearing date of 24 August 2012. This appeal has been triggered by the events set out above. The appeal has been adjourned until 26 October 2012 to enable the Licensing Committee to be advised of the latest representations by the taxi drivers, but is very likely to proceed if the livery proposals are implemented as they stand.

As matters stand at present, the Council faces 2 different types of potential legal challenges.

Legal Proceedings seeking Judicial Review

The first of these is an application for judicial review of the decision of the Council’s Licensing Committee (LC) at its meeting on 21 June 2012. Judicial Review (JR), if granted, is an order of the Court “quashing” (i.e. making of no valid effect) the LC’s decision. It should not be confused with an appeal. If the decision is quashed, the Council could decide not to proceed with the livery requirement, in which case there would be no need to take any further action. However, if it did want to pursue the livery requirement, it is suggested that it would be appropriate for officers and members to revisit relevant issues, accompanied by a full consultation and then a comprehensive officer report will then be made and presented to the Committee with all the appropriate recommendations.

The potential costs of JR proceedings are considerable and are likely to be in the order of tens of thousands. The Administrative Court is very busy and, even on the initial application seeking permission to pursue JR, can take up to 6 months. After that, it can take up to 18 months or more, depending on Court availability and other factors which cannot be predicted in advance.

If JR proceedings against the Council are successful, this is conclusive evidence of maladministration, which would be likely to bring the reputation of the Licensing Committee and of the Council itself into potential disrepute. It would also mean that the taxi drivers had defeated Members’ intentions, which could lead to problems in future dealings with those concerned. It is not the Council’s decision whether or not JR is sought – that is up to the taxi drivers.

Appeal against the Licence Condition

Appeal against a licence condition is to the Magistrates’ Court in the first instance, with a right of appeal against their decision to the Crown Court (and potentially even higher). There is confusion in the Minutes in that those of the LC meeting on 1 November 2011 state that livery applies to hackney carriage and private hire vehicles, whereas the Minute of the meeting on 21 June 2012 purportedly states that livery applies only to hackney carriages. Assuming the former, there could in theory be successive appeals over a period of time from a large proportion of (we are told) about 390 drivers.

The Council’s own costs of defending an appeal in the Magistrates’ Court could easily run to upwards of £1,000 per case. If unsuccessful, the Council would also have to pay the

other side's costs which could easily amount to £1,500 or more, as drivers normally instruct specialist lawyers from outside the area. In the Crown Court, the Council would have to instruct a barrister. Costs there can easily amount to £3,000 for the Council alone and significantly more for the other party (taxi driver).

OTHER IMPLICATIONS

Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.

Crime and Disorder / Equality and Diversity / Consultation/Public Engagement.

CRIME AND DISORDER

Liveried taxis were considered by members at previous meetings to improve public confidence in safety and reduce crime and disorder by offering a highly visible licensed hackney carriage fleet particularly in regard to the late night economy.

EQUALITY AND DIVERSITY

An Equality Impact Assessment has been undertaken and the improved qualifications and training requirements for taxi drivers will include customer care and equality and diversity awareness. However there are no direct implications for equality and diversity arising from the issues in this report.

AREA/WARDS AFFECTED

All wards.

PART 3 – SUPPORTING INFORMATION

BACKGROUND

Licensed taxis are often the first port of call for visitors to the district and the last point of departure. The quality of service received will make a significant impact on Tendring's tourist economy, as well as the local resident community.

The Tendring District is, amongst other things, a tourist destination with a tourist-driven economy. One way of improving the public image of the District is to raise the standards required for hackney carriage vehicle and drivers' licences.

There are many good reasons for raising the standards for of taxis, apart from providing a boost to the local tourist economy. Good standard taxis can act as a flagship from Tendring when visiting other areas, such as airports and other towns, and they can also encourage the elderly and vulnerable to go out more.

An extensive discussion on raising standards took place at a meeting of the Licensing Committee in the Summer of 2010.

At the request of Members of the Licensing Committee, Officers were tasked to revisit the terms and conditions for acceptance as a licensed Hackney Carriage / Private Hire driver and/or vehicle with a view to enhancing the image and professionalism of the trade. A consultation list of intended measures was circulated to every driver licensed by this Authority and the results formed part of a report to the Licensing Committee.

The intended changes (14 criteria in all) to the terms and conditions for acceptance as a licensed taxi range from improved customer care qualifications, dress codes, improved

knowledge standards and other ideas.

However, one of the 14 intended changes has attracted considerable attention, that being the establishment of a liveried fleet.

All 14 criteria were put to the Licensing Committee on 1 November 2011. Members decided to accept all the recommendations and set an implementation date of 3 January 2012.

However, when Officers were in the process of informing the trade of the Members' decision, they were made aware of a Crown Court judgment which had not been brought to their attention during the consultation. The Officers were also informed that there was likely be an appeal against Members' decision based on the Newcastle Crown Court judgment.

It was proposed to make a further report to Committee regarding livery in the context of the Newcastle Crown Court judgment. This was intended to ensure that, in the event of a legal challenge, it could not be argued that Members of the Licensing Committee were not fully informed when making their decision.

CURRENT POSITION

The meeting of the Licensing Committee on 21 June 2012 considered the implications of the Newcastle Crown Court decision and confirmed their original decision to have a liveried fleet of Hackney Carriages.

An inception date of 1 October 2012 was agreed, to allow officers time to present options for designs for the logo on the front door panels of liveried Hackney Carriages to the Licensing Committee before the 1st October deadline.

Since the Licensing Committee meeting on the 21 June 2012 the Council has received a number of representations from the taxi trade.

At a meeting held on 16 July 2012 at the request of representatives of the taxi trade in Tendring and officers from Public Experience, officers advised that they were not in a position to reverse decisions of the Licensing Committee. However, officers agreed to report back to the Committee that at least those taxi drivers present at the meeting would support a single colour option for a taxi livery (preferably silver) and that the trade intended to appeal to the Magistrates' Court against the Licensing Committee's decision.

An appeal was duly lodged in the Colchester Magistrates' on behalf of a taxi operator. At the court hearing on 24 August 2012, the appeal was adjourned until 26 October 2012.

BACKGROUND PAPERS FOR THE DECISION

None

APPENDIX

Appendix A – (1) Consultation letter dated 5 September 2011 sent to all 390 private hire and hackney carriage licensed drivers

(2) E-mail dated 28 June 2012 from one of the drivers to the Council's Chief Executive, setting out written representations objecting to the decision of the Licensing Committee on 21 June 2012

(3) Letter dated 20 July 2012 to the Council from The National Private Hire Association

Appendix B – Options for design of front side panels of hackney carriages.

JUNE CLARE
HEAD OF PUBLIC EXPERIENCE

^ND,CPOCCUP.LICASE;
^ND,ADDRESS.LIAPPLICANT;

Licensing
Westleigh House
Carnarvon Road
Clacton on Sea
Essex CO15 6QF

Please ask for: Mr D O'Neill
Tel: 01255 686590
Fax: 01255 686343
E-Mail: doneill@tendringdc.gov.uk
Our Ref: DO/ST/^ND,PLATEREF.LICASE;

05 September 2011

Dear Sir / Madam

HACKNEY CARRIAGE / PRIVATE HIRE NEW PROPOSALS

The vision for the Tendring District shared by the Council and its various partners in the community is for the District to be a vibrant, healthy and attractive place to live, work and visit. In pursuit of this vision the Council is currently reorganising internally, seeking to improve the services it delivers both directly and indirectly to the public.

The reason for writing to you is this includes activities licensed by the local authority.

Tendring District Council's Licensing Committee has re examined many long standing issues and is now seeking ways to improve the image of the taxi trade. The intention behind this is to enhance the travelling experience of both residents and visitors to the District and to improve opportunities for the taxi trade to increase business. This will require a willingness to review current practices and seek better ways of working, raising standards and meeting customer expectations both from within the taxi trade and the Council.

In order to achieve this as a first step the Council intends to amend the acceptance criteria for both drivers and vehicles. An officer/member working group has produced proposals which members of the Licensing Committee have agreed as suitable for consultation with the trade and other interested parties.

By working together it is hoped we will be able to promote and support tourism and economic growth for the benefit of all residents and businesses in the District.

Please look at the list of suggestions and proposals below and feedback responses to us by the date requested. Your views are important and further consultation will be organised to enable more detailed discussion to take place between the Council and the taxi trade.

Please note that there will be a presentation on the above to be held at Council Chambers at the Council Offices, Weeley on Monday 26th September 2011 starting at 7pm to which you are accordingly invited to attend. Please notify the Licensing Office if you intend to attend.

HACKNEY CARRIAGE / PRIVATE HIRE NEW PROPOSALS

1. All new drivers are to obtain a BTEC, or it's equivalent, in passenger handling prior to making an application. Agree Disagree
2. All new drivers are to pass a DVSA drivers test. Agree Disagree
3. All new drivers are to pass an enhanced knowledge test. Agree Disagree
4. Consider interviews for new applicants and prior questionnaire. Agree Disagree
5. Character references to accompany new applications. Agree Disagree
6. The introduction of positive publicity for taxis by means of ideas such as a "Best Driver/Best Taxi" competition, judged by Members, whereby the winner would receive a free vehicle/driver's licence and / or other suitable reward(s). Agree Disagree
7. The introduction of a "higher quality award" for taxis with associated privileges. Seeking to transform the taxi business from a trade to a profession. Agree Disagree
8. A minimum dress code. Agree Disagree
9. Introduction of regular meetings with the trade. Agree Disagree
10. Taxi news letter and regular customer engagement / consultation (public and taxi drivers). Agree Disagree
11. Improved licence administration including MOT/Safety testing. Agree Disagree
12. Partnership with Essex Police and other agencies providing intelligence on crime and to support vulnerable people. Agree Disagree
13. New vehicles licensed by this authority to be of a standard design such as white with the bonnet and boot/rear panel coloured Tendingring Corporate green with the council crest to be displayed on the front doors of the vehicle. Agree Disagree
14. The introduction of a knowledge test for all new Private Hire applicants. Agree Disagree

If you have any comments or further ideas you wish to be considered then please complete the suggestion box overpage and return them to the Licensing Office **NO** later than the **22nd September 2011**.

Continue overpage...

COMMENTS AND SUGGESTIONS

If you have any queries please do not hesitate to contact my Enforcement Officer Darren O'Neill, on 01255 686590.

Yours sincerely



ALAN TOLMIE
LICENSING OFFICER

Please return to:
Licensing Officer
Tendring District Council
Westleigh House
Carnarvon Road
Clacton on Sea
Essex CO15 6QF

THE NATIONAL PRIVATE HIRE ASSOCIATION



8 Silver Street, Bury, Lancashire BL9 0EX. Tel: 0161-280 2800 Fax: 0161-280 7787 Email: npha@btconnect.com

20 July 2012

by email: mgibson-davies@tendringdc.gov.uk

Mr M Gibson-Davies
Head of Legal Department
Tendring District Council
Town Hall, Station Road
Clacton-on-Sea CO15 1SE

REF: Hackney carriage livery requirement

Dear Sir

We write on behalf of our members in your licensing area, to highlight their concerns about the decision taken at the council's Licensing Committee on 21 June 2012 that "all vehicles wishing to be licensed as hackney carriages for the first time will need to be white with the bonnet and boot/rear panel in Tendring Corporate green."

According to the notice your council sent to licence holders in the area, "anyone who wishes to appeal against this decision will need to apply to a Magistrates' Court before 7 August 2012." This indicates to us that the "decision" is a condition of licence, and that such condition may be appealed to the Magistrates' Court within 21 days of the decision having been notified to licence holders, rather than the date the decision was ratified.

Three of our members recently attended a meeting with the council in order to attempt to ascertain whether the council's "decision" was adopted as a policy, or imposed as a condition of licence. They were subsequently informed that it is a policy – which of course may only be challenged in the Administrative Court within 90 days of the decision having been taken.

Following this meeting, the aforementioned letter was sent out to all licence holders with the wording as detailed herein. We write therefore to formally enquire of the Legal Department exactly what legal status the council decision has, and how is it being applied. There is no question of the fact that, whichever form the decision takes, the trade is determined to challenge that decision.

In view of the strict time limits imposed by the Courts, we formally request a response within seven working days. Thank you.

Yours faithfully

For **THE NATIONAL PRIVATE HIRE ASSOCIATION**

BRYAN M ROLAND
General Secretary

From: Stephanie Conroy [stephanie9588717@aol.com]

Sent: 28 June 2012 16:38

To: Ian Davidson

Cc: Cllr. Ivan Henderson; Cllr. Neil Stock, Leader of the Council, Tendring District Council; Cllr. Michael Talbot; Cllr. Pierre Oxley

Subject: Tendring taxi proposed colour change

Dear sir

I am writing to you in regard to the licensing committee meeting dated 21st June 2012, regarding item 8 on the agenda, points a3 and a4.

We wish to lodge an official appeal of the decision made at the above meeting regarding Tendring taxi colour change to White with corporate green flashings and corporate logo.

We have a petition from Tendring taxi drivers the majority being opposed to this decision.

We also have a substantial amount of information we have collated in regard to points a b c d e and f in the above said document in our favour.

We believe the decision made is wrong to insist we have a White car with corporate green flashings and Tendring logo, as it will be costly to drivers and make earning a living more difficult than it is at present.

Tendring district council currently have in excess of 300 hackney plated vehicles but only provide us with 55 rank spaces for these vehicles to rank on and ply for trade. So as you can probably imagine making a living in this trade is hard in the current economic climate and with fuel prices being so high, as a trade we are having difficult times financially.

We believe the committee members should hear our points of view on the information given to them by the licensing department and re vote when they have read our relevant information.

Below are reasons why points a b c d e and f from above said document are not valid, also a list of reasons why we as Tendring taxi drivers believe this would harm our trade, the amount of money we earn and the confusion it could cause to the public.

A. Numerous web searches indicate that White represents only 3% of used cars (which the majority of taxi drivers purchase). White cars achieving the highest value on average, reflecting that White is a fashionable choice on higher value executive cars. They would depreciate at a higher rate as White shows chips, scratches and general wear and tear more than any other colour vehicle. Especially if a green vinyl panel was removed from bonnet and boot as this would leave a 'two tone' White effect, making resale at Market value impossible without an expensive respray.

B. We believe this point to be totally invalid as hackney carriages in T.D.C adopting a White with corporate green flashings as opposed to White only in the Durham case, is probably worse. And still, as stated in Durham case, is not reasonably necessary.

C. The current licensing requirements for hackney carriage drivers are a top light, license plate on vehicle, license badge, worn at all times when working, along with company door signs displayed on front doors of vehicle, also livery on other vehicles is adequate in recognising a properly licensed taxi.

D. Insurance companies allow a maximum of 90 days to keep a courtesy car, if in this time the car is written off it will be hard to obtain a White car to fit the other criteria set out by the councils licensing department. Numerous web searches on auto trader, exchange and mart and various other auction sites show a very low number of White second hand vehicles fitting the correct criteria. Therefore this may result in us having no vehicle for a time thus not being able to earn a living.

E. The officers found no difficulty on finding White cars on tesco web site, tesco car site ceased trading in April 2012 making it impossible to check. In regard to ford motor company, stating no extra time to wait for for a White car, a small number of drivers purchase a brand new car with majority buying second hand. They also stated that within the last 12 months there has been a 60% increase of White cars being sold (therefore increasing cars for second hand Market), refer back to point a where research shows this is a fashionable choice on higher value executive cars, these would not be suitable as a hackney carriage vehicle. As stated in point d searches found very few second hand White vehicles on various web sites.

F. From a web search we could not find van/truck hire, pineapple seem to be a small firm as when phoned on numerous occasions, there is always an answer service giving you

a mobile number to ring which was not answered, also on their site was only 2 White suitable vehicles for sale. Cab direct also only had 2 White suitable vehicles, making these firms very restrictive to use. Further research showed suitable vehicles when found would take up to 10 weeks for delivery.

They also mention Colchester as being our nearest borough to have a liveried fleet. This is incomparable with T.D.C proposal, as Colchester have all black cars with a magnetic removable council crest on the front door, not permanent vinyl film on boot and bonnet.

Below are some of the reasons Tendring taxi drivers believe this will be detrimental to our trade.

1. The financial outlay for this would be unfair to the driver, as even if council reduce license fee by introducing one mechanical test per year instead of two, thus allowing money to be regained, this would take the entire ten years of a cars lifespan as a taxi, ten years is a long time when your earnings are low, sometimes below minimum wage.
2. The majority of owner drivers only usually have usage of their taxis for business and personal travel, having a White car with green bonnet and boot would make personal usage very restrictive.
3. White is a hard colour to keep clean and maintain, as it shows dirt, chips, scratches and general wear and tear more than other coloured vehicles.
4. The proposed car colours would not be suitable or acceptable by customers for functions such as weddings, funerals and other society events. It would also be objectionable to clubs, organisations and customers for certain travel which would result in serious loss of business and earnings.
5. Regarding important criminal activity, a customer complaint, enquiry or query (such as loss of property) we feel we would be unable to differentiate identifying a vehicle if required to.
6. The vehicle in the proposed livery could easily be targeted by thieves, assuming that cash may be in the vehicle, also expensive equipment could be removed easily. The damage, time off the road and insurance claim would be costly and highly aggravating for drivers and fleet operators. This is avoidable at present as top light and door signs are removable when not at work.
7. We will not be easily identifiable as our different taxi firms when we have to pick up from schools, pubs, clubs, supermarkets and other leisure establishments for pre arranged bookings. Especially Essex county council contract work and Essex county social care work. A lot of our customers are elderly and children who cannot identify cars by make and model, they identify us by our large magnetic door signs with company name on logo on, or by the colour car they are told to look for by the office operator.
8. The public may believe we work for T.D.C if we have the T.D.C corporate colours and logo on our cars, this could result in confusion for the public.
9. Drivers will lose work if all cars are the same colour, other drivers may inadvertently pick up the wrong customer, resulting in confusion and distress, especially if the customer is a child or elderly person. This will also happen at large events as no one will know which taxi is for them.
10. Second hand White cars are hard to obtain, as proven by web searches, new cars are available, but as self employed people in the current economic climate, obtaining this amount of finance is nearly impossible.
11. After the green vinyl is removed from the car, it will leave a 'two tone' effect making the cars resale value lower than the Market value, without an expensive respray.

In conclusion we request a review of this decision, as we do not wish to involve our trade or Tendring district council in any unnecessary legal expense.

We request a meeting with you as chief executive, to put our grievances and all information collated to support our case forward.

We have also sent copies of this to Douglas Carswell mp, Neil Stock, Ivan Henderson, Michael Talbot and Pierre Oxley.

We await your reply
Yours sincerely
Stephanie Conroy
On behalf of Tindrings taxi drivers
Witnessed by
Delores Samms



OPTION 1



OPTION 2



OPTION 3



OPTION 4



OPTION 5



OPTION 6

