

Manchester City Council Report for Resolution

Report to: Licensing and Appeals Committee – 9 February 2015

Subject: Review of Hackney Carriage Advertisement and Livery Policy -

Report of: Head of Planning Building Control and Licensing

Summary

This report provides the Committee with details of the consultation responses received following the Committee decisions on the 27 August 2013 (min LAP/13/33 refers) and 17 February 2014 (min LAP/14/03 refers) to consult on a review of the Manchester's Hackney Carriage Advertisement and Livery Policy. A copy of the report to Committee on 17 February 2014 is attached to the report at **Appendix 2**

In addition the report provides information relating to other advertisement matters, which the City Council has been asked to consider in relation to vehicle roof top advertisements and vehicle identification light boxes. It also highlights the key issues that members are required to consider in the determination of such matters.

Recommendations

1. The Committee are asked to consider the content of the report; having regard to the attached appendices, the Law Commission proposals, Department for Transport's Taxi and Private Hire Vehicle Licensing Best Practice Guidance published March 2010 and any representations made at the meeting and determine each of the following issues.
 1. In respect of the content of the advertisements' allowed in the current policy – whether or not to include an additional section that addresses Health and Safety and the Protection of the Public
 2. The location of advertisements on hackney carriage vehicles and in particular whether this should be amended.
 3. Whether new/replacement vehicles should be restricted in relation to the location of advertisements.
 4. Should advertisements- should advertisements that cover the whole or part of a hackney carriage be allowed?
 5. Should the policy be amended to allow the use of roof signs for advertisements.
 6. Livery and Identification of vehicles- Bespoke London type hackney carriage vehicles and other Manchester licensed hackney carriage vehicles. Should new/replacement vehicles be subject to colour restriction?
 7. Consideration of a mandatory 'Vehicle Identification Light Box' to be fitted in all HCV's.

2. In coming to a decision on the above, Members are asked to consider the weight that should be given to any potential financial implications balanced against the aims of the Advertisement policy
3. Should the Committee determine that it is minded to amend the current advertisement policy that Officers be requested to bring back a further report that includes an updated 'Advertisement Policy'

Wards Affected: All

Community Strategy Spine	Summary of the contribution to the strategy
Performance of the economy of the region and sub region	Any enhanced restriction for advertising on hackney carriages will result in a loss of income to those proprietors who currently choose to advertise on their vehicle(s). This may be offset if the Committee determined the permitted use of roof top advertisements on hackney carriage vehicles.
Reaching full potential in education and employment	Any restriction on the use of full/part body wrap advertisements' could result in a loss of employment in suppliers/fitters of such advertisements. Although difficult to quantify at this stage additional employment may be gained if the Committee were minded to approve the use of rooftop signs.
Individual and collective self esteem – mutual respect	Not applicable to the content of this report
Neighbourhoods of Choice	Not applicable to the content of this report

Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue - None

Financial Consequences – Capital - None

Contact Officers:

Name: Ann Marku

Position: Principal Licensing Officer (Taxis)
Telephone: 800 6291
E-mail: a.marku@manchester.gov.uk

Name: Julie Roscoe
Position: Head of Planning, Building control and Licensing
Telephone: 800 6291
E-mail: J.roscoe@manchester.gov.uk

Background documents

Report to the Licensing and Appeals Committee 27 August 2013
Report to Licensing and Appeals Committee 17 February 2014
Local Government (Miscellaneous Provisions) Act 1976
Department for Transport's Taxi and Private Hire Vehicle Licensing Best Practice
Guidance published March 2010
Law Commission Proposals Taxi and Private Hire Services- May 2014

1. Introduction

- 1.1 On 27 August 2013 following a review of Manchester's Hackney Carriage Vehicle Policy, the Committee requested officers undertake a consultation process in respect of advertisement and livery (inside and outside) of Manchester's hackney carriage vehicles (Advertisement review). A copy of the current advertisement policy is attached to the report at **Appendix 1**
- 1.2 The current policy advises where advertisements' are allowed to be displayed, the advertisement consent process, TV advertisement and compliance and enforcement.
- 1.3 Officers conducted two separate consultations in relation to the advertisement review and the respective responses will require consideration; these relate to:
- responses from the consultation that took place between September and December 2013, closing on 9 December 2013. As provided within **Appendix 2** , and;
 - responses from the consultation that took place between October and December 2014, closing on 29 December 2014. As provided within **Appendix 3**
- 1.4 In relation to the two consultations and other advertisement matters, vehicle roof top advertisement and vehicle identification light boxes members are asked to consider each of the following key issues, which are dealt with in the report under separate headings.
- The content of the advertisements' allowed in the current policy – whether or not to include an additional section that addresses Health and Safety and Protection of the Public
 - Location of advertisements on hackney carriage vehicles – should they remain the same
 - Should new/replacement vehicles be restricted in the location of advertisements
 - Advertisements- should advertisements that cover the whole or part of a hackney carriage be allowed?
 - Potential associated financial implications
 - Use of roof signs for advertisements
 - Livery and Identification of vehicles- Bespoke London type hackney carriage vehicles and other Manchester licensed hackney carriage vehicles. Should new/replacement vehicles be subject to colour restriction?
 - Consideration of a mandatory 'Vehicle Identification Light Box' to be fitted in all HCV's.

2. Background

- 2.1 On 17 February 2014 the Licensing and Appeals Committee considered a report (attached at **Appendix 2**) which provided further information regarding the review of the advertisement policy and that due to a technical omission the on-line consultation had been incomplete.

- 2.1.1 The report also informed that Counsel's advice had been sought on whether having regard to the consultation responses as received and taking into consideration the legal requirements included within the report if it was appropriate for the Council to consider a more restrictive advertisement policy ie a single colour /black livery for new and replacement vehicles and the proposed requirement for additional signage.
- 2.1.3 The advice outlined in Paragraph 3.3 to 3.3.4 of the 17 February 2014 report (Appendix 2) is important and will need to be a key factor in the determination process. Members will recall if consideration is to be given to a more restrictive policy, there should be an awareness of any unintended consequences together with financial implications.
- 2.1.4 The advice also suggested that a survey should be undertaken to establish if the existing policy was effective in terms of members of the public being able to differentiate between hackney carriage and private hire vehicles..
- 2.1.5 As a result a second set of questions were compiled and an additional on-line consultation was carried out between 6 October 2014 and 29 December 2014. A copy of the consultation questions are attached at **Appendix 4**.

3.0 Consultation responses

- 3.1 In relation to the second consultation set out in 2.1.5 the responses were much lower than the previous earlier consultation. In relation to the trade consultation only 5 responses were received. The responses to the nine questions that required either a 'Yes' or 'No' answer have been transposed into table 1 below.

Table 1 Consultation responses (Trade)

Question	YES	NO
Are you happy for your response to be made public	3	2
Should the public easily recognise a hackney carriage licensed by us	2	3
Should we change the rules on advertising	3	2
Should vehicles be allowed to advertise their own radio base	2	3
Should all hackney carriage vehicles be black	3	2
Should all vehicles have the words 'Licensed by'	1	4
Do you think we should ban adverts	4	1
Do you think the vehicles licence number should show on an illuminated box	3	2
IF 'YES' Should it be compulsory	2	3

- 3.2 In response to the other questions. These together with their responses have are also provided within **Appendix 4**
- 3.3 In relation to the public consultation 63 Public responses were received. The responses to the two questions that required a Yes or No answer have been transposed into table 2 below.

Table 2 Consultation responses (Public)

QUESTION	YES	NO
4. Should our hackney carriage vehicles look different to hackney carriages from other councils?	42	21
6. Every hackney carriage shows a unique licence number on plates on the front and back of the taxi. Do you think this number should also be shown on an illuminated box inside?	33	30

- 3.4 In response to the other questions. These together with their responses are also provided within **Appendix 4**

3.5 Officer Comments on Consultation Responses

- 3.5.1 It is clear in terms of both consultations that there are differing views (albeit the responses have been very limited) within the hackney carriage trade and that there is no overriding opinion regarding advertising or any of the associated matters.
- 3.5.2 The public consultation responses, however, which, sought to seek the level of public awareness regarding identification of hackney carriage and private hire vehicles' appear to indicate a general awareness of how to distinguish between a hackney carriage and private hire vehicle.
- 3.5.3 A number of the consultation responses agree with the preference of the Committee 'for Manchester licensed hackney carriage vehicles to have no adverts, be black in colour and carry the Council crest'. Members will need to balance the preference for a vehicle that symbolises it is licensed by Manchester (A Manchester brand) against possible financial implications. (see section 4.5 of the report)
- 3.5.4 At the time the consultation was in progress the Council was approached by a firm called 'Eyetease' who specialise in the use of vehicles roof advertisements on hackney carriage vehicles. Eyetease have provided a submission for the Committees attention, a copy of which is attached at **Appendix 5**.

- 3.5.4.1 The submission provides information in support of the approval process for digital advertising screen unit (digital taxitop) on the roof of 'Black Taxis' in Manchester. The submission details the approval of the 'digital taxitop' by Transport for London.
- 3.5.5 A second firm called Open Taxi Tops Ltd, has also approached Officers in relation to a product called "Open Messenger. The firm have also developed a dual sided LCD Screen that displays digital advertisements on Black Hackney Taxis. Unfortunately related documentation sent to the Licensing Unit could not be downloaded and attached to this report. A representative from the firm is likely to attend the meeting.

4.0 Key issues

- 4.1 The following paragraphs 4.2 to 4.9 outline the key issues (1-7) as set out in the recommendation to this report.
- 4.1.1 For clarity advertisements should not be confused with the identification features of hackney carriage vehicles licensed by Manchester City Council

4.2 1. Content of the advertisements' allowed in the current policy

- 4.2.1 The relevant part of the current advertisement policy that deals with the content of advertisements that are permitted to be displayed on hackney carriage vehicles states;

2. Static Advertising (relate to adverts that are placed on the outside of the vehicle)

Advertising Materials

Materials used must be professional in appearance and manufactured to a high standard so as to be durable and not easily defaced, soiled or detached.

Vehicle owners should make available their advertisements to be inspected by Licensing Unit Officers when requested.

Advertising Criteria

A number of factors will be considered when the City Council determines whether to consent to an advertisement. Each proposal will be considered on its own merits.

One factor which may be considered is whether the advert complies with the British code of Advertising, Sales Promotion and Direct Marketing ('The Code'). Applicants should refer to the Code itself for a full explanation of all the guidelines. If an advertisement does not comply with the Code then consent may be refused or withdrawn

Consent will not be given for advertisements which are:

- *illegal* - marketers have primary responsibility for ensuring that their marketing communications are legal. Marketing communications should comply with the law and should not incite anyone to break it.

- *Indecent or offensive* - marketing communications should contain nothing that is likely to cause serious or widespread offence. Particular care should be taken to avoid causing offence on the grounds of race, religion, sex, sexual orientation or disability. Marketing communications will be judged on the context, medium, audience, product and prevailing standards of decency.
- *dishonest* - marketers should not exploit the credulity, lack of knowledge or inexperience of consumers.
- *untruthful* - no marketing communication should mislead, or be likely to mislead, by inaccuracy, ambiguity, exaggeration, omission or otherwise.

4.1.2 This section relating to the content of advertisements' has not been reviewed for sometime and does not take into account 'Health/Safety and Public Protection issues

4.1.3 As proposed by the Licensing and Appeals Committee of 21 August 2013 Members may wish to determine whether it is appropriate to introduce into the policy a presumption against consent being given for advertisements as follows.

Health/Safety and Protection of the Public – advertisements which market the following will not be approved:

- *Alcohol*
- *Cigarettes*
- *Gambling*
- *Payday loans (or similar)*

4.1.5.1 The aim of the Council in licensing hackney carriage and private hire vehicles is to protect the public. Whilst advertising on hackney carriage vehicles does not form part of the 'licensing process' the Council has a duty to ensure that they do not promote advertisements, which may have a detrimental affect on the health and well being of the public.

4.3 2. Location of advertisements on hackney carriage vehicles

4.3.1 The section of the current policy that deals with the location of advertisements on hackney carriage vehicles states

1. Advertising Surfaces

Hackney Carriages Vehicles

- "full livery" - advertising material covering the complete exterior body shell
- "supersides" - advertising material covering the exterior doors and wings on both sides of the vehicle, excluding the window area
- "doors only" - advertising material covering the exterior lower panels of both doors on both sides of the vehicle

- "rear window" - advertising material covering the rear window of the vehicle, provided the material is see-through from the interior
- "hub caps" - advertising material covering the hub caps on all four wheels
- base of the occasional (tip-up) seats

4.3.2 It is acknowledged that the Law Commission ((LC) 3.2 (page 22)) Recommendation 4 which relates to advertising focuses on the use of word "taxis" and that it should only be used by the providers' of licensed taxi services in describing themselves on vehicles or in advertising materials. It is not believed the recommendation is relevant to this report.

4.3.3 The question under consideration is whether the existing policy in relation to the location of advertisements' is still relevant and applicable, or are there reasons, that can be substantiated, to warrant change. .

4.4 3. Should the location of advertisements be restricted on new/replacement vehicles?

4.4.1 Manchester has a policy of 'controlled expansion' of hackney carriage vehicle proprietor licences, determined by an 'Unmet demand survey which takes place every three years.' This means that unless any unmet demand is determined the licensing unit does not receive any 'new hackney carriage vehicle proprietor licence applications'. Any changes in advertisement policy would only affect new vehicles at the stage of any controlled expansion of hackney carriage vehicle proprietor licences.

4.4.2 In relation to replacement vehicles this could result in a scenario whereby a vehicle has broken down and is replaced (for a short period of time) by a hackney carriage, which the proprietor has hired from a company. Such vehicles are normally pre-licensed by the hire Company and may or may not have advertisements attached to the bodywork. The question in this instance is the reasonableness and practicalities of applying the Policy to a temporary vehicle.

4.4.3 Any changes to the 'advertisement policy' should relate to new (with immediate effect) and renewal/replacement vehicles (by a given date in the future, for example by 1 April 20**) and any advertisements' on all renewal/replacement vehicles must conform with the Council Policy as agreed on ***** (or similar wording)

4.5 4. Advertisements- should advertisements that cover the whole or part of a hackney carriage be allowed?

4.5.1 Hackney carriage advertisements', which cover the whole of the vehicle, are known as a 'full wrap'. Advertisement companies submit requests for advertisements' in writing to the Licensing Unit, where they are viewed and if determined as satisfactory permission is granted for their use on hackney carriage vehicles, normally for a year.

4.5.2 In relation to the trade there are some positive and negative aspects of having an advertisement wrap covering the whole of a vehicle. The following details have been provided by representatives of the hackney carriage trade and 'Ubiquitous' and 'Hughmedia' advertisement Companies.

1. A trade representative (Name and address supplied)

Monthly income from super side can be: £ 50.00 per month (mostly these type ads last 1/3 month). Some time repair to the cab afterward could be more than the income hence not many owner are keen for this type adverts.

Full warps again vary in duration and income, so contract have built in for putting cab back to its original condition, so they will pay for any body work and paint. But some get away by not paying for this or try to give the owner a different ad to continue, thus pocket any money for re spray. The income for full wraps can be as much as £600.00/700.00 for full year. I have known some may even pay as much as £1000.00 but not many or often.

2. A Trade representative (name and contact details supplied)

When I had my own cab which was a few years ago, the payments usually varied from £40-£100 per month for supersides, full wraps were £800-£1500 per year. These were the prices generally paid by the advertisement agencies, some individual proprietors also had private arrangements directly with businesses.

Sometimes the removal of advertisements causes damage to paintwork, this is supposed to be paid for by the advertisement agency but is not always the case, leaving a proprietor to foot the bill, or alternatively try to get another advert to cover the damage (not always possible) and keep up this cycle until the cab is due to be replaced or is accident damaged and hence has to be repaired.

Overall the extra income that advertisements generate is needed by the trade to offset the very high costs of purchasing and running a hackney carriage in Manchester.

3. Ubiquitous – (see Appendix 3 of report of 17 February 2014, which is attached to this report as Appendix 2)

Good to hear from you. Please see standard prices below- these sometime change depending on the length of a campaign or if the driver is used for PR or VIP use.

The below are averages.

- *Full wrap £1,000 to £1,500 per annum*
- *SuperSides £1,250 to £1,500 per annum*
- *doors (not applicable)*
- *bonnet (not applicable)*
- *boot (not applicable)*

- *wings only (not applicable)*
- *other (please state) TIP SEATS ONLY- 325 PER ANNUM.*

It is not just the drivers who benefit from campaigns, it's also the fitters, printers and our local Managers.

We could also tell you how many cabs were used last year and what the combined benefit to Manchester is, taking into account the benefit to the clients and additional revenues gained from the use of Taxi advertising.

4. Hughmedia

On average a full livery advertisement provides drivers with an income of between £800 - £1200 per year. Superside Advertisements can pay between £60 - £80 per month. This can be topped up by payments for interior seat advertising and rear screen advertising anything between £20 and £40 per month.

We have recently placed an advertisement for a 2 year period which includes a cash payment and a Caribbean holiday worth £3000, total value is in excess of £4200. To some taxi owners it is an essential form of income, especially in these austere economic times and provides extra income to the taxi trade in general be it garages, insurance companies, city councils etc.

The cost of removing the advertisement is met by the agency that holds the contact for the advertisement which is an agreement between the taxi owner and the provider of the advertisement.

4.6 As can be seen above the issue of a financial implication has been raised, in relation to both proprietors and advertisement companies.

4.6.1 Any change to the advertisement policy could potentially result in some form of financial loss in terms of advertisement companies and associated fitters and printers. There may also be a wider financial implications, (however, to what extent cannot be quantified without an independent financial assessment) and these should be weighed and balanced against the objectives for changing elements of the current policy.

4.7 **5. Use of rooftop signs for advertisements**

4.7.1 As outlined in paragraphs 3.54 and 3.55 of the report an approach has been made by two Companies 'Eyetease' and 'Open Taxi Tops Ltd' who wish the Council to consider the adoption of the use of 'rooftop' advertisements. A representative from both companies has asked to be invited to attend the meeting.

4.7.2 Both companies only make reference to their products being available for the bespoke London Taxi's. Members may wish to seek clarity on whether the products could be provided for the additional types of vehicle, as set out in 4.8.5, currently licensed in Manchester as hackney carriages.

4.7.2 Whist considering the financial issue highlighted in 4.6.1 members may also wish to consider whether there are any possible economic benefits as a consequence of such advertising..

4.7.2.1 It is difficult at this stage to quantify whether the approval of 'rooftop advertisement signs would have any financial gains for the City. Members may wish to explore this further at the meeting.

4.8 6. Livery and Identification of vehicles- Bespoke London type hackney carriage vehicles and other Manchester licensed hackney carriage vehicles. Should new/replacement vehicles be subject to colour restriction?

4.8.1 Department of Trade Best Practice Guidance (Section 38) which relates to vehicle identification does not refer to hackney carriage vehicles. The guidance suggests possible approaches in relation to private hire vehicles ie prohibition of displaying signs, identification plates placed on the front and rear of vehicles.

4.8.2 As Manchester only licence bespoke hackney carriage vehicles' it is acknowledged that it more likely the public are able to distinguish between these and private hire vehicles.

4.8.3 One of the Law Commission Recommendations (31) advocates that National standards should promote enforcement, protection of the environment and accessibility, in addition to safety. The LC makes reference to section 47(2) of the Local Government (Miscellaneous Provisions) Act 1976 (detailed in 4.8.5)

4.8.4 The policy and conditions which enables the public to differentiate between vehicle types licensed by the Council both as both private hire and hackney carriage vehicles is attached to the report at **Appendix 6**.

4.8.5 Since the policy detailed at Appendix 6 was adopted, the Council has licensed additional types of vehicles as hackney carriages or private hire. The body shell of the Mercedes M8 and Peugeot E7 hackney carriages are almost identical to the Mercedes Vito and Peugeot Eurobus, which are licensed as private hire vehicles. There is a need to consider what measures are required to ensure that the appearance of hackney carriages meet the requirements of Section 47 of the Local Government (Miscellaneous Provisions) Act 1976, as detailed below.

Section 47 of the Local Government (Miscellaneous Provisions) Act 1976 states that a hackney carriage should be of such a design and appearance or bear such distinguishing marks to clearly identify it as a hackney carriage.

4.8.6 The bespoke London taxi cab is distinguishable from other types of vehicle due to its unique design. However, the changes to Manchester hackney carriage vehicle policy have introduced new vehicle types which have a body shell that are less distinguishable by design than the bespoke London taxi

cab. As the City Council must ensure that all hackney carriages are compliant with section 47 of the Act, alternative measures may be necessary. For example, as identified in Appendix 6, Mercedes Vito taxis are required to be black or full liveried.

4.8.6.1 This policy objective was clear in that it is to ensure that Mercedes Vito taxis remained distinguishable by their black colour from Mercedes Vitos licensed as private hire vehicles which would be silver or white colour.

4.8.6.2 When licensing the Mercedes Vito it was agreed that although the vehicles had to be black in colour they could display signage ie strip down side, taxi signs etc. The current types of vehicle (Mercedes Vito Taxi, Mercedes M8, Peugeot E7 display different manufacturers' signage. Members may wish to look at a more inclusive policy that will encompass all types of vehicle licensed in Manchester as hackney carriage vehicles.

4.9 7. Consideration of a mandatory 'Vehicle Identification Light Box' to be fitted in all HCV's.

4.9.1 The function of the Council in licensing hackney carriage drivers and vehicles is one of public safety. As hackney carriage vehicles in Manchester are all vehicles of a prescribed type, and therefore of fairly uniform appearance, it is important for travelling passengers to be in a position to easily identify the vehicle itself should the need arise for example if the passenger should wish to make a complaint.

4.9.2 At present a vehicle can be identified by its licence number, which is scribed on plates fixed to the front and rear of the vehicle.

4.9.3 By way of improving passenger safety, representatives of the hackney carriage trade have requested the mandatory introduction of a 'VILB', which would be fitted inside every hackney carriage vehicle. The cost of the unit is currently £30 plus vat for supply and around £15 plus vat for fitting (the unit can be easily fitted by most garages)

4.9.4 The cost of the light box would be funded by hackney carriage vehicle proprietors. Officers have not been able to identify any other funding options.

4.9.5 On 28 September 2014 an e-mail was received from Mr Les Reid (a copy of which is attached at **Appendix 7**), in which he expressed concerns as to the light emitted from the 'VILB'.

4.9.5.1 Enquiries have revealed that the light omitted by the VILB, which would be fitted inside the vehicle on the partition screen, is 5 watts (less than that given out from an interior light) The VILB is currently mandatory in Liverpool City and is fitted in approximately 1500 vehicles.

5.0 Officer Comments

- 5.1 Advertisements should not be confused with the identification features of hackney carriage vehicles licensed by Manchester City Council. The two issues are separate. One deals with the livery ie colour licence identification, whilst the other deals with advertisements' that are displayed either in or on a hackney carriage vehicle and are likely to have a commercial interest.
- 5.2 Hackney carriage vehicles which currently carry advertisements will normally have been tied into a contract for 1 or 2 years. Should Members decide to make any changes to the current advertisement policy this should be taken into account and consideration given to a Policy, which includes a transitional period for compliance.
- 5.3 Members have outlined a desire to brand hackney carriage vehicles with the Council crest. This raises some questions in relation to cost (of production and applying the crest) and which crest would be preferable.(the original Manchester crest or the newer modern version) .
- 5.4 Following consideration by Committee on the matters raised above it is likely a further report will be necessary that provides an updated 'Advertisement Policy'. Aside from any changes the Committee would wish to make to the policy, there is an opportunity to make the policy more user friendly .

6.0 Contributing to the Community Strategy

6.1 (a) Performance of the economy of the region and sub region

- 6.1.1 Any enhanced restriction for advertising on hackney carriages will result in a loss of income to those proprietors who currently choose to advertise on their vehicle(s).
This may be offset if the Committee determined the permitted use of roof top advertisements on hackney carriage vehicles.

6.2 (b) Reaching full potential in education and employment

- 6.2.1 Any restriction on the use of full/part body wrap advertisements' could result in a loss of employment in suppliers/fitters of such advertisements.
Although difficult to quantify at this stage additional employment may be gained if the Committee were minded to approve the use of rooftop signs.

6.3 (c) Individual and collective self-esteem – mutual respect

6.4 (d) Neighbourhoods of Choice

7. Key Policies and Considerations

7.1 (a) Equal Opportunities

- 7.1.1 There are no equal opportunities issues arising from this report. The policy would apply equally to all hackney carriage proprietor licence holders

8.2 (b) Risk Management

- 8.2.1 Any requirements imposed that are deemed to be unreasonable could be subject to legal challenge via the judicial review process.
- 8.2.2 Section 47 of the Local Government (Miscellaneous Provisions) Act 1976 provides an opportunity for licence holders to appeal any conditions imposed on a licence to Magistrates Court

9.3 (c) Legal Considerations.

- 9.3.1 These are outlined in section 3 of the report of 17 February 2015, which is attached to this report at appendix 1

10. Conclusion

- 10.1 The subject of this report is complex in nature and Members are asked to fully consider its content and that of the appendices, which includes the report of 17 February 2014 before determining the key issues.
- 10.2 The report details the key issues as identified from previous reports and the consultation responses and follows the decision of the Committee in August 2013 to consult on a review of the City Councils Advertisement Policy; it sets out the responses received, the technical error in the consultation process and the recommended options going forward
- 10.3 Section 4 of the report provides the Committee with information on potential financial implications if there are changes to the current advertisement policy especially if advertisements' on the outside body of vehicles were to be phased out. Although the implications are not easy to quantify at this stage and clearly have to be weighed against the objectives for any change..
- 10.4 The report further details additional matters for consideration such as the mandatory fitting of a Vehicle Identification Light Box in every hackney carriage vehicle and roof top advertisements.
- 10.5 A further report to Committee is likely to be required in terms of an updated 'advertisement policy'.



Policy for Advertising on / in Licensed Hackney Carriage and Private Hire Vehicles

1. Advertising Surfaces

This policy covers advertising in the following forms:

Hackney Carriages Vehicles

- "full livery" - advertising material covering the complete exterior body shell
- "supersides" - advertising material covering the exterior doors and wings on both sides of the vehicle, excluding the window area
- "doors only" - advertising material covering the exterior lower panels of both doors on both sides of the vehicle
- "rear window" - advertising material covering the rear window of the vehicle, provided the material is see-through from the interior
- "hub caps" - advertising material covering the hub caps on all four wheels
- base of the occasional (tip-up) seats

Private Hire Vehicles:

- "rear doors only" - advertising material covering the exterior rear doors, excluding the window area
- "hub caps" - advertising material covering the hub caps on all four wheels

Advertising in other locations is not permitted. TV advertising is considered separately in section 3 of this policy.

2. Static Advertising

Advertising Materials

Materials used must be professional in appearance and manufactured to a high standard so as to be durable and not easily defaced, soiled or detached.

Vehicle owners should make available their advertisements to be inspected by Licensing Unit Officers when requested.

Advertising Criteria

A number of factors will be considered when the City Council determines whether to consent to an advertisement. Each proposal will be considered on its own merits.

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One factor which may be considered is whether the advert complies with the British code of Advertising, Sales Promotion and Direct Marketing ('The Code'). Applicants should refer to the Code itself for a full explanation of all the guidelines. If an advertisement does not comply with the Code then consent may be refused or withdrawn

Consent will not be given for advertisements which are:

- *illegal* - marketers have primary responsibility for ensuring that their marketing communications are legal. Marketing communications should comply with the law and should not incite anyone to break it.
- *Indecent or offensive* - marketing communications should contain nothing that is likely to cause serious or widespread offence. Particular care should be taken to avoid causing offence on the grounds of race, religion, sex, sexual orientation or disability. Marketing communications will be judged on the context, medium, audience, product and prevailing standards of decency.
- *dishonest* - marketers should not exploit the credulity, lack of knowledge or inexperience of consumers.
- *untruthful* - no marketing communication should mislead, or be likely to mislead, by inaccuracy, ambiguity, exaggeration, omission or otherwise.

Applying for advertisement consent

Applications for advertisement consent should be made in writing to:

Taxi Licensing Team
PO Box 532
Manchester
M60 2LA

Or emailed to: taxi.licensing@manchester.gov.uk

Applications should be accompanied by:

- A colour photograph or colour copy of proposed artwork and details of the intended size of advertisement.
- How long the advertisement is required for.
- Details of the licensed vehicles it is intended for.

Applicants may expect a response within 10 working days.

Advertising consents will be granted for a maximum 12 month period.

3. Advertising via TV Screens

Advertising via TV screens is only permitted in hackney carriages.

- Advertisements displayed by way of pre-recorded or live feed material will be expected to comply with the criteria set out above and will be expected not to be illegal, indecent offensive, dishonest or untruthful as described above.
- The City Council's general policy is to consent to the display of advertisements by pre-recorded or live feed material provided that they comply with the above criteria.
- In the event that the City Council is satisfied that the material has been displayed which does not comply with these criteria for consent, the consent for display for pre-recorded or live feed material may be withdrawn.

Applying for Consent to Install TV installation

This policy covers TV and radio systems, which can be viewed by passengers. It is designed to ensure systems do not interfere with passenger comfort, safety or convenience.

Hackney Carriage proprietors may be given consent to install TV systems in hackney carriages under Byelaw 4(3), providing they comply with this policy.

Installations must comply with the policy to the satisfaction of the Licensing Unit Manager. However, the Licensing Unit Manager will consider each case on its own merits and in exceptional circumstances may give consent to systems, which do not comply with all parts providing the system meets the overall objectives of the policy.

Consent for installation is subject to:

- All advertising material complying with the City Council's advertising policy

All broadcast material complying with:

- the OFCOM Broadcasting Code AND
- the criteria contained in the Licensing Unit advertising policy (current proposals are that advertisement must not be illegal, indecent or offensive, dishonest or untruthful)

All film/video material:

- classified by the BBFC as U, Uc or exempt from classification AND
- comply with the criteria contained in the Licensing Unit advertising policy (current proposals are that advertisements must not be illegal, indecent or offensive, dishonest or untruthful)

All systems complying with the following design and construction criteria:

- All equipment must comply with any legislative requirements in respect of Construction and Use Regulations and other legislation.
- All equipment must be designed, constructed and installed in such a way and in such material as to present no danger to passengers or driver, including from impact with the equipment in the event of an accident or damage from the electrical integrity being breached through vandalism, misuse or wear and tear.
- The equipment must not interfere with any other safety, control, electrical, computer, navigation, satellite or radio system in the vehicle.
- The intensity of any screen should not be such as to be visually intrusive or dazzling. The position of the screen must not obstruct the passenger's view of the meter and the visibility of the screen to following vehicles should be minimal.
- Any screen shall be no larger than 15".
- All equipment must be installed in the driver's compartment and should not be visible from the driver position.
- The installation must not be such as to weaken the structure or any component part of the vehicle or interfere with the integrity of the manufacturer's original equipment.
- The design must be discreet and complement the interior furnishing of the vehicle.
- The system must include safeguards to maintain the integrity of the system and prevent the display of unapproved material.
- Passengers must have control of the volume and picture (which should be both capable of being turned off) and the driver should be able to lower the sound level if it is causing him/her a distraction. The sound should be automatically muted when the intercom is operated.
- A notice should be displayed within prominent view and physical reach of all passenger seats giving instructions to passengers as to adjusting the volume. The notice shall be in a suitable format and design for visually impaired people and visible in low light conditions.
- The mute/volume control must be accessible from the nearside and offside passenger seats and from the flip seats.
- Once activated the mute should continue without further activation by the passenger until the passenger leaves the vehicle.
- All equipment must be protected from the elements, secure from tampering and located such as to have no impact on the luggage carrying capacity of the taxi.

Compliance and Enforcement

Vehicle checks may be carried out by Licensing Officers to ensure compliance with the policy. In the event of non-compliance with any aspect of the policy, consent may be withdrawn. Action may be also taken against vehicle drivers and proprietors in the event of non-compliance with the policy. The action would depend on the circumstances but could include suspension of the vehicle or driver licence, prosecution or a notice to rectify a defect.

Taxi Licensing Team
Manchester City Council
PO Box 532
Manchester
M60 2LA
E-mail: taxi.licensing@manchester.gov.uk
Web: www.manchester.gov.uk/taxis

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**Manchester City Council
Report for Resolution**

Report to: Licensing and Appeals Committee – 17 February 2014
Subject: Review of Hackney Carriage Advertisement and Livery Policy
Report of: Head of Planning, Building Control and Licensing

Summary

This report provides the Committee with details of the consultation responses received following the Committee's decision on the 27 August 2013 to consult on a review of Manchester's Hackney Carriage Advertisement and Livery Policy.

The report provides further information regarding the review of the above Policy having regard to the original proposals and the consultation responses. Also highlighted is a technical omission on the online consultation which resulted in an incomplete consultation.

Of particular importance is the legal advice provided in respect of any proposed changes to the current policy

Purpose of Report

The report provides the Committee with the relevant information to allow the committee to make a decision as to whether to undertake any further work in respect of the review of the Policy

Recommendations

1. The Committee consider the report including appendices
2. That the Committee determine that the current advertisement and livery policies in respect of hackney carriage vehicles remain in place

Or

The Committee request officers to undertake a public survey to identify the level of public awareness regarding identification of hackney carriage and private hire vehicles

and

Repeat the on line consultation ensuring that all questions detailed in Appendix 1 are included in the online questionnaire

and

That officers undertake further work including a consultation exercise aimed at establishing the cost / benefit analysis associated with the proposed revised policy (the specific details to be agreed in consultation with the Chair and deputy)

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Wards Affected: All

Community Strategy Spine	Summary of the contribution to the strategy
Performance of the economy of the region and sub region	Any enhanced restriction for advertising on hackney carriages will result in a loss of income to those proprietors who currently choose to advertise on their vehicle(s)
Reaching full potential in education and employment	Not applicable to the content of this report
Individual and collective self esteem – mutual respect	Not applicable to the content of this report
Neighbourhoods of Choice	Not applicable to the content of this report

Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue
None

Financial Consequences – Capital
None

Contact Officers:

Name: Jenette Hicks
Position: Licensing Unit Manager
Telephone: 0161 234 4962
E-mail: j.hicks1@manchester.gov.uk

Name: Ann Marku
Position: Principal Licensing Officer (Taxis)
Telephone: 0161 219 6291
E-mail: a.marku@manchester.gov.uk

Background documents

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

Report to the Licensing and Appeals Committee 27 August 2013
Local Government (Miscellaneous Provisions) Act 1976
Department for Transport's Taxi and Private Hire Vehicle Licensing Best Practice Guidance published March 2010

1. Introduction

- 1.1 Following a review of Manchester's Hackney Carriage Vehicle Policy, the Committee requested officers undertake a consultation process in respect of advertisement and livery of Manchester's hackney carriage vehicles.
- 1.2 The consultation proposals were detailed in the report considered by the Committee on 27 August 2013 for completeness these are included at **Appendix 1** of this report

2. Consultation

- 2.1 The consultation took place between September and December 2013 and closed on 9 December 2013
- 2.2 The questions provided within Appendix 1 were converted into an online questionnaire. Following the close of consultation, responses were collated and in the preparation of this report it was noted that no responses had been received in relation to the questions detailed in pages 4 and 5 of Appendix 1.
 - 2.2.1 Investigations revealed that the questions from pages 4 and 5 had not been included in the on line consultation.
- 2.3 The consultation involved
 - A letter sent to every Manchester Hackney Carriage Proprietor advising them how to access the online consultation.
 - An e-mail sent to all hackney carriage trade representatives advising them of the link to the online consultation and that a letter advising the same was being sent to all hackney carriage proprietors
 - The consultation being published on the Councils website
 - E mails being sent to the following organisations advising them of the consultation Manchester safeguarding Children Board, GMP, Adults Safeguarding, NHS, Manchester Airport and Advertisers
- 2.4 Consultation responses
 - 2.4.1 Forty five on line responses were received and one written response (this represents a response rate of between 4 and 5 %). A number of the on line responses were made anonymously and several responses were from advertising companies.
 - 2.4.2 One respondent provided two separate consultation responses however this has been clarified and confirmation obtained in writing that one of the responses was on behalf of a trade union the other was submitted on behalf of an individual member of the union.
 - 2.4.3 A full copy of the on line consultation responses are provided at **Appendix 2**. The written consultation response is contained at **Appendix 3**

2.4.4 An overview of the questions that had appeared in the consultation and the responses received to date are shown in Table 1 below and demonstrate that there is not a consistent view held by all respondents on the partial consultation.

Table 1 Consultation responses

Question	Yes	No
1. Should the current advertisement locations on/in hackney carriage vehicles be left as they are?	26	18
2. Should all new/replacement hackney carriage vehicles be allowed to advertise on only...	-	-
2a. The rear door and wings on both sides of the vehicle (excluding the window area)?	13	
2b. The rear window - covering the rear window of the vehicle, provided the material is see-through from the interior?	10	
2c. Inside the vehicle on the base of the tip-up seats?	24	
3. Should all new/replacement hackney carriage vehicles only be allowed to advertise their own radio base etc on the rear doors?	14	28
4. Should all new and replacement licensed hackney carriages be black in colour?	25	20
5. Should all hackney carriages have a Manchester crest displayed on the front doors of the vehicle? It is proposed that the crest, as seen at the top of this page, is used and would incorporate wording 'Licensed by'	22	23
6. Are there other ways in which hackney carriage vehicles licensed by Manchester City Council can be distinguished in appearance and or have such distinguishing marks to clearly identify the vehicle as a hackney carriage?	18	25

2.5 Officer Comments

2.5.1 It is clear that the responses received to date in the consultation represent differing views within the hackney carriage trade and that there is no overriding opinion on the matter

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- 2.5.2 The written response provided at **Appendix 3** provides some information regarding financial benefits to the taxi trade associated with advertising income, this is not something the Council could verify or validate at this time. This would require an independent piece of work to be undertaken on the assessment of associated cost/benefits.
- 2.5.3 Following receipt of the consultation responses legal advice has also been sought regarding the consultation responses received, and how the City Council may wish to proceed in reviewing the policy. The relevant legislative framework together with an overview of the legal advice received is detailed in section 3 of the report below.
- 2.5.4 It also remains unclear as to what proposals the Law Commission review (expected April 2014) will provide in relation to hackney carriage and private hire standards. The timescales for consideration and implementation of the Law Commission proposals is also vague.

3.0 Legal implications

- 3.1 The Local Government (Miscellaneous Provisions Act) 1976 details provisions that are directly relevant to this policy in particular section 47 of the Act states the following
Licensing of Hackney Carriages
- (1) A district council may attach to the grant of a licence of a hackney carriage under the Act of 1847 such conditions as the district council may consider reasonably necessary.
 - (2) Without prejudice to the generality of the foregoing subsection, a district council may require any hackney carriage licensed by them under the Act of 1847 to be of such design or appearance or bear such distinguishing marks as shall clearly identify it as a hackney carriage.
 - (3) Any person aggrieved by any conditions attached to such a licence may appeal to a magistrates' court.
- 3.2 In addition to the above legislation the Council ought to have regard to the Department for Transport's Taxi and Private Hire Vehicle Licensing Best Practice Guidance published March 2010. The section relating to policy justification has been reproduced below

3.2.1 The Role of Licensing: Policy Justification

The aim of local authority licensing of the taxi and PHV trades is to protect the public. Local licensing authorities will also be aware that the public should have reasonable access to taxi and PHV services, because of the part they play in local transport provision. Licensing requirements which are unduly stringent will tend unreasonably to restrict the supply of taxi and PHV services, by putting up the cost of operation or otherwise restricting entry to the trade. Local licensing authorities should recognise that too restrictive an approach

can work against the public interest – and can, indeed, have safety implications.

For example, it is clearly important that somebody using a taxi or PHV to go home alone late at night should be confident that the driver does not have a criminal record for assault and that the vehicle is safe. But on the other hand, if the supply of taxis or PHVs has been unduly constrained by onerous licensing conditions, then that person's safety might be put at risk by having to wait on late-night streets for a taxi or PHV to arrive; he or she might even be tempted to enter an unlicensed vehicle with an unlicensed driver illegally plying for hire.

Local licensing authorities will, therefore, want to be sure that each of their various licensing requirements is in proportion to the risk it aims to address; or, to put it another way, whether the cost of a requirement in terms of its effect on the availability of transport to the public is at least matched by the benefit to the public, for example through increased safety. This is not to propose that a detailed, quantitative, cost-benefit assessment should be made in each case; but it is to urge local licensing authorities to look carefully at the costs – financial or otherwise – imposed by each of their licensing policies. It is suggested they should ask themselves whether those costs are really commensurate with the benefits a policy is meant to achieve.

- 3.3 Counsel's advice has been sought on whether having regard to the consultation responses received and the legal requirements above, it would be appropriate for the Council to proceed to a more restrictive advertisement policy, a single colour/ black livery for new and replacement hackney carriages, and the proposed requirement for additional signage.
- 3.3.1 The City Council has been advised that if it wishes to consider a change to the current policy it should make full and proper enquiries into the need for the change of Policy, the effectiveness of the proposals and any unintended consequences/detrimental effects that a policy change would produce. The City Council is advised to weigh up all of those factors and to consider whether the policy is proportionate to the problem.
- 3.3.2 The advice also suggests that the efficiency of the current policy should be tested by undertaking a survey to see if members of the public can tell a hackney from a private hire vehicle.
- 3.3.3 In addition and as noted in 2.5 the City Council would need to consider the financial implications of a change in policy. This would best be undertaken by way of an independent assessment.
- 3.3.4 Failure by the Council to properly consider the above matters may provide support for a judicial review challenge on the grounds of disregard of relevant considerations. If members therefore are minded to pursue the matter further it is recommended that the additional work highlighted in 3.3.1 to 3.3.3 be undertaken in order to de risk and provide a robust platform for policy change

4. Options

- 4.1 Having regard to the consultation responses and the subsequent legal advice received and outlined in this report there are two options for the Committee to consider

That the Committee determine that the current advertisement and livery policies in respect of hackney carriage vehicles remain in place

Or

The Committee request officers to undertake a public survey to identify the level of public awareness regarding identification of hackney carriage and private hire vehicles

and

Repeat the on line consultation ensuring that all questions detailed in Appendix 1 are detailed in the online questionnaire

and

That officers undertake further work including a consultation exercise aimed at establishing the cost / benefit analysis associated with the proposed revised policy (the specific details to be agreed in consultation with the Chair and deputy)

5.0 Contributing to the Community Strategy

5.1 (a) Performance of the economy of the region and sub region

- 5.1.1 Any enhanced restriction for advertising on hackney carriages will result in a loss of income to those proprietors who currently choose to advertise on their vehicle(s)

5.2 (b) Reaching full potential in education and employment

5.3 (c) Individual and collective self-esteem – mutual respect

5.4 (d) Neighbourhoods of Choice

6. Key Policies and Considerations

6.1 (a) Equal Opportunities

- 6.1.1 There are no equal opportunities issues arising from this report. The policy would apply equally to all hackney carriage proprietor licence holders

6.2 (b) Risk Management

- 6.2.1 Any requirements imposed that are deemed to be unreasonable could be subject to legal challenge via the judicial review process.

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6.2.2 Section 47 of the Local Government (Miscellaneous Provisions) Act 1976 provides an opportunity for licence holders to appeal any conditions imposed on a licence to Magistrates Court

6.3 (c) Legal Considerations.

6.3.1 These are already outlined in section 3 of the report

7. Conclusion

7.1 This report follows the decision in August 2013 to consult on a review of the City Councils Advertisement Policy; it sets out the responses received, the technical error in the consultation process and the recommended options going forward

7.2 The consultation responses provide a number of conflicting views including a significant number of responses, which do not support the proposed changes. To assist consideration of the matter legal advice has been sought. In order to protect the Council from risk and challenge it has been confirmed that the City Council should undertake further work if it wishes to proceed with a revised policy at this stage. This would provide a much stronger and robust basis for a change in the policy as previously outlined by the Committee.

7.3 It is therefore recommended that the Committee either determine whether to leave the current policy in place or ask officers to undertake further work as detailed in the recommendations and re-examine the policy at a future day when more information is available.

Consultation Proposals

Having regard to recent changes to Manchester's Conditions of Fitness (i.e. vehicle specification) for Hackney Carriages, the City Council considers it appropriate to review the advertisement and livery policy in respect of Hackney Carriage vehicles.

(Please note there is no consultation or change proposed in respect of private hire vehicle advertisement and livery policy)

The Consultation exercise is in respect of the following:

- A. Advertisements on hackney carriage vehicles
- B. Livery i.e. identification/ distinguishing marks of hackney carriage vehicles

The consultation will be an electronic consultation utilising the Council's website. All Manchester hackney carriage proprietors will be advised of the consultation in writing.

A. Advertisements on hackney carriage vehicles.

Currently hackney carriage vehicles can advertise on the following locations on/in the vehicle.

- (i) On the outside of the vehicle:
 - Full livery - advertising material covering the complete exterior body shell
 - Supersides - advertising material covering the exterior doors and wings on both sides of the vehicle, excluding the window area
 - Doors only - advertising material covering the exterior lower panels of both doors on both sides of the vehicle
 - Rear window - advertising material covering the rear window of the vehicle, provided the material is see-through from the interior
 - Hub caps - advertising material covering the hub caps on all four wheels
- (ii) On the inside the vehicle:
 - Tip-Up Seats-base of the occasional (tip-up) seats

Consultation questions

1. Should the current advertisement locations on / in hackney carriage vehicles be left as it is? Yes ☐ No ☐

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Please provide reason(s) for your answer

Should all new/replacement hackney carriage vehicles only be allowed to advertise on :-

- the rear door and wings on both sides of the vehicle (excluding the window area)? Yes ☐ No ☐

Please provide reason(s) for your answer

- the rear window covering the rear window of the vehicle, provided the material is see-through from the interior? Yes ☐ No ☐

Please provide reason(s) for your answer

- inside the vehicle on the base of the tip-up seats? Yes ☐ No ☐

Please provide reason(s) for your answer

3. Should all new/replacement hackney carriage vehicles only be allowed to advertise their own radio base etc on the rear doors? Yes ☐ No ☐

Please provide reason(s) for your answer

B. Livery i.e. identification / distinguishing marks of hackney carriage vehicles

The legislation states that a hackney carriage vehicle should be of such a design and appearance or bear distinguishing marks to clearly identify it as a hackney carriage.

Bespoke London taxis are easy to identify due to their design, but other licensed hackney carriage vehicles e.g. the Mercedes Vito taxi and the Peugeot E7 have identical body shells to vehicles licensed for private hire e.g. the Mercedes Vito and Peugeot Eurobus. Advertising and Livery policies need to ensure that hackney carriage and private hire vehicles are distinguishable.

Currently bespoke London taxi company vehicles are allowed to be any colour. Manchester licensed Mercedes Vito taxis, Peugeot E7 SE and Mercedes M8 have all been required to be black in colour (or the option of full livery for the Mercedes Vito taxi) All Manchester licensed Hackney carriage vehicles have a small taxi plate on the front of the vehicle and a larger rear plate containing an expiry date that identifies the vehicles as being licensed by Manchester City Council.

Consultation questions:

1. Should all new and replacement licensed hackney carriages be black in colour? Yes ☐ No ☐

Please provide reason(s) for your answer

2. Should all hackney carriages have a Manchester crest displayed on the front doors of the vehicle? Please see the Council crest – it is proposed that the crest as shown below is used and would incorporate wording "Licensed by" Yes ☐ No ☐



**MANCHESTER
CITY COUNCIL**

Please provide reason(s) for your answer

3. Are there other ways in which hackney carriage vehicles licensed by Manchester City Council can be distinguished in appearance and or have such distinguishing marks to clearly identify the vehicle as a hackney carriage?

Please provide reason(s) for your answer

Vehicles that can be licensed as either hackney carriage or private hire vehicles.

Questions:

1. Should there be a separate advertisement policy in relation to hackney carriage vehicles that are not of the design of the London Taxi Company vehicle (e.g TX vehicles) ? Yes ☐ No ☐

Please provide reason(s) for your answer

2. Should licensed hackney carriages other than the bespoke London Taxi be restricted to the colour black? Yes ☐ No ☐

Please provide reason(s) for your answer

Content of Adverts.

The current policy includes the following information:

- 1) A number of factors will be considered when the City Council determines whether to consent to an advertisement. Each proposal will be considered on its own merits.
- 2) Materials used must be professional in appearance and manufactured to a high standard so as to be durable and not easily defaced, soiled or detached. Vehicle owners should make available their advertisements to be inspected by Licensing Unit Officers when requested.
- 3) One factor which may be considered is whether the advert complies with the British code of Advertising, Sales Promotion and Direct Marketing ('The Code'). Applicants should refer to the Code itself for a full explanation of all the guidelines. If an advertisement does not comply with the Code then consent may be refused or withdrawn

Consent will not be given for advertisements which are:

- 1) Illegal - marketers have primary responsibility for ensuring that their marketing communications are legal. Marketing communications should comply with the law and should not incite anyone to break it.
- 2) Indecent or offensive - marketing communications should contain nothing that is likely to cause serious or widespread offence. Particular care should be taken to avoid causing offence on the grounds of race, religion, sex, sexual orientation or disability. Marketing communications will be judged on the context, medium, audience, product and prevailing standards of decency.

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- 3) Dishonest - marketers should not exploit the credulity, lack of knowledge or inexperience of consumers.
- 4) Untruthful - no marketing communication should mislead, or be likely to mislead, by inaccuracy, ambiguity, exaggeration, omission or otherwise.

In relation to the content of any advertisements it is proposed that consideration be given to adding the following within the policy (shown in italics)

Health/Safety and Protection of the Public – advertisements which market the following will not be approved:

- *Alcohol*
- *Cigarettes*
- *Gambling*
- *Payday loans (or similar)*

Question:

1. Do you think the statement shown above in italics should be included in the advertisement policy as advertisement that should not be approved?
Yes ☐ No ☐–

Please provide the reason for your answer

2. Are there any other issues in relation to the type of advertisements on/in hackney carriage vehicles that you feel should be addressed?

Comment box required here

For the purpose of clarification please note that there is no intention to review the advertising policy in relation to Advertising via TV screen , nor is the advertising on private hire vehicles included within the scope of this review.

Ref	Date Received	1. Should the current advertisement locations on/hackney carriage vehicles be left as they are?	Please provide reason(s) for your answer to Question 1.	2. Should all new/replacement HC vehicles be allowed to advertise on only...	2a. The rear door and wings on both sides of the vehicle (excluding the window area)?	2b. The rear window - covering the rear window of the vehicle, provided the material is see-through from the interior?	2c. Inside the vehicle on the base of the tip-up seats?	Please provide reason(s) for your answer to Question 2.
1	16/09/2013	No	Many of the Liveries are a disgrace. Many are put on vehicles just to camouflage bad bodywork. I believe all Hackney vehicles should be black only, when registered for the first time.					No commercial events whatsoever
2	16/09/2013	Yes	Livery is more an attractive subject than just side adverts					New or replacement vehicle should allow all forms of adverts in and out
3	17/09/2013	No	all adverts should be removed from outside the vehicle, they make the vehicles look tacky. The tip up seats are not on show except inside the vehicle which is for the person hiring to be advertised too				Y	Tip up seats only
4	17/09/2013	No	Uniform black colour externally would be more distinct and professional-looking. Perhaps small adverts on front door panels to advertise ride system.				Y	
5	17/09/2013	No	A lot of liveries on vehicles are peeling off and they look bad in the city				Y	there are adverts placed at the public that hire the vehicles to go from A to B
6	10/09/2013	Yes	It generates extra income for the owner towards the cost of insurance	Y			Y	Buses carry advertisements on them so why not taxis.
7	16/09/2013	No	with the advent of specialised 2 way vision material the whole rear passenger side windows should also be allowed.					
8	16/09/2013	No	Are the Peugeot and Mercedes permitted to have full livery? If they are it will cover the Taxi signage that is a necessary aid down by the city council on this type of vehicle. If they still have to show the Taxi signs then this is unacceptable to the advertiser as it interrupts the advert. It would appear to be discriminatory against owners of this type of vehicle.					I would like licensing to ban all livery on all Hackney Vehicles and only allow radio firms to be advertised. I would also like to see a Manchester Croud shown somewhere on the vehicle to show which licensing authority it belongs to. I mean a sizeable croud perhaps displayed on both front doors of all vehicles.
9	16/09/2013	Yes	Taxi Advertising provides a much needed secondary income for drivers.	Y			Y	Tip up seats give the passenger information to consider when they do not want to talk to driver.
10	26/09/2013	No						
11	26/09/2013	Yes	They cause no problems and should be left as they are. The extra revenue helps going to off set the insurance costs					
12	22/09/2013	No	Clean and tidy look will be for the hackney vehicles to be black all over				Y	My view is the adverts look very tacky and unprofessional
13	22/09/2013	Yes						
14	24/09/2013	Yes						
15	25/09/2013	No	I think black cabs should be left free of adverts on the outside as it makes the fleet look shabby & unprofessional. exceptions should allow radio company logos e.g. mersey.				Y	as above
16	23/09/2013	Yes				Y	Y	should be left as they are
17	30/09/2013	Yes	It gives the owner the option to earn extra income in those difficult economic times by advertising on different areas of their vehicle.					It should be allowed all over the vehicle as it is now.
18	01/10/2013	Yes	Businesses should be able to advertise as per their needs and their budget. Whether a full livery or just a rear window advert.			Y	Y	As long as it is see through, rear window advertising should be allowed as this won't interfere with the drivers view.
19	02/10/2013	Yes	The adverts look good and help to make the cabs look tidy	Y		Y	Y	
20	04/10/2013	No	They look untidy and they make an old cab look better				Y	
21	04/10/2013	Yes	As a matter driver the advertising on the cabs get us more work					There should be no change to the current policy
22	04/10/2013	Yes	freedom of choice, and as vehicle belongs to owner as a business they need to maximise earning potential					policy should be left as it is
23	05/10/2013	No	much better visibility, to recognise black cabs without adverts				Y	as previous
24	05/10/2013	Yes	I can see nothing wrong with the current arrangement. Any amendment in policy would result in a loss of much needed revenue in the current economic climate.					I can see nothing wrong with the current arrangement. Any amendment in policy would result in a loss of much needed revenue in the current economic climate.
25	06/10/2013	No	Looks like a criminal parade instead of a fleet of taxis. They also cover up a multitude of sins.				Y	The tip up seat advert is inconspicuous and the taxi will still look like it belongs to a fleet.
26	09/10/2013	No	no uniformity in trade look tidy do not look professional/gimmicky					
27	09/10/2013	Yes						The advertising on the taxis meaning public hire should be left as they are. the private hire should not be uniformed in colour and should not have advertising
28	10/10/2013	No	Full advertising wraps on the outside of cabs causes more visual clutter in the street environment and makes the city look untidy.				Y	Keeping the outside of the cab clear and tidy - making the city's street look better.
29	10/10/2013	Yes		Y		Y		
30	13/10/2013	Yes	This allows for all advertisers to be able to secure the amount of space in relation to their needs. Hackney Vehicles are a great way for company's to promote themselves & this should not be limited to those national but rather local as well in order to stimulate the local economy in Manchester.	Y		Y	Y	Advertising should be allowed in all these specific areas, we need to promote & create wealth in Manchester & allow businesses to develop their potential in our city. This will attract more visitors & inform residents & new comers of the great corporate, leisure & social opportunities in this city.
31	05/11/2013	Yes	Advertising provides an additional revenue income for hackney carriage operators. If advertising were changed or restricted it could push up the cost of taxi fares.	Y		Y	Y	Advertising provides an additional revenue income for hackney carriage operators. If advertising were changed or restricted it could push up the cost of taxi fares.
32	10/11/2013	No					Y	
33	19/11/2013	No	need a more simple consistent approach	Y				simple and maintains visibility

Ref	Date Received	3. Should all new/replacement HC vehicles only be allowed to advertise their own radio base etc on the rear doors?	Please provide reason(s) for your answer to Question 3.	4. Should all new and replacement licensed HC be black in colour?	Please provide reason(s) for your answer to Question 4.	5. Should all HC have a Manchester crest displayed on the front door of the vehicle? It is proposed that the crest, as seen at the top of this page, is used and would incorporate wording "Licensed by"	Please provide reason(s) for your answer to Question 5.	6. Are there other ways in which HC vehicles licensed by Manchester City Council can be distinguished in appearance and/or have such distinguishing marks to clearly identify the vehicle as a HC?	Please provide reason(s) for your answer to Question 6.
1	16/09/2013	No	As already stated, back to black. No adverts at all	Yes	For identification and safety	Yes	It would enhance the vehicle. It would also reassure the travelling public that the vehicle was licensed in Manchester and give them a feeling of greater safety.	No	
2	16/09/2013	Yes	Not every owner wished to have an advert in vehicle as a radio advert is suitable as they are working for radio company	Yes	Black only but any advert colour is OK	No	A crest would impose on a livery advert	No	Current highlight is sufficient
3	17/09/2013	No	makes the vehicle look busy and unprofessional	Yes	all black with the council logo on the door and lets be proud of this fantastic city	Yes	definitely best idea ever by licensing	Yes	City Council Logo on the front door and all black in colour the best would be a shining example to the country
4	17/09/2013	Yes		Yes		Yes			
5	17/09/2013	No	makes the hackney carriage vehicles look ugly and dirty	Yes	all one unified colour and black like the vehicle perfectly	Yes	Yes very good idea makes them look part of the best city in the north west	Yes	they have the line sign on the roof and with the crest on the door what more is needed
6	16/09/2013	Yes	So the public can see what radio system the cab is on.	No	The travelling public like to get in a cab that is not black, the comments I get about my none black cab is what a change to get in a cab that is not black.	No	It is already on the plate so why go to more expense	No	No the public know that a Manchester cab is a typical London style. The main problem is out of town hackney saloon cars with bad roof signs on
7	16/09/2013	No	not beneficial for driver as phone operators may make them carry on ads for not revenue	Yes	mobile's causes problems when removing adverts.	No	discretion by nature a plate on the back of the cab is adequate	Yes	a yellow light on roof
8	16/09/2013	Yes	See previous answer	Yes	I would support a policy for all Hackney Carriages to be black in colour. If by introducing a black only policy is a non starter then I question your policy of only accepting Peugeot and Mercedes in black only. London whose lead we have always followed allow any colour for their fleet of Mercedes Hackney Carriages. I'm sure that the public have the same problems in identifying Private Hire from Hackney in London as they permit the same colour vehicles, but perhaps they have better enforcement and issue higher penalties to any vehicles caught working outside the law. I would like Manchester to allow an any colour policy to all Hackney Vehicles as I don't believe a black only policy would ever be proposed. Private Hire have to be in white or silver but in a certain spectrum within white or silver. My proposal would be for Hackney to be any colour including white and silver but outside of this spectrum that it relates to Private Hire.	Yes	See previous answer	Yes	Bornas on all vehicles to be white in colour. As in Leeds.
9	19/09/2013	No		Yes	Classic image of hackney cab	No		No	Taxi advertising is a great income, this would affect advertising
10	20/09/2013	No		No		No		No	
11	26/09/2013	Yes	It helps the public to get in a radio cab they have booked	No	If there is a shortage of new used cabs the second choice is one in a different colour. The public know that Manchester has other colours	No	All the years Manchester has not had a crest on the door, so we do not need them, the travelling public know a cab is a cab.	No	Leads well done no change is needed
12	22/09/2013	No	The radio company's need to advertise in a more appropriate manner	Yes	The proof is in the pudding most people will say "I'm getting a black cab" on a multi coloured advertising board home	Yes	To distinguish between Manchester licensed vehicles and all the new out of area hackneys that never know where they are going	No	
13	22/09/2013			No	the London lads in any colour are easily distinguishable via and ET should be in black	Yes	hackney carriages stand out any way but having a crest is a good idea	No	
14	24/09/2013	No		Yes		No		No	
15	26/09/2013	Yes	public identification	Yes	makes it easier for public to identify we are known as black cabs not silver or red cabs.	Yes	In these days where taxis from different local authorities appear to be able to operate as PH cars with impunity, we need as much unique markings as possible to differentiate us from these intruders.	No	
16	27/09/2013	Yes	Helpful to customers	No	Only The new LTI mobile	Yes	no body actually looks at the plates on the front and rear of the taxi, so this will make it easily visible	No	see Q4

Ref	Issue Raised	3. Should all replacement HC vehicles only be allowed to advertise their own radio base etc on the rear doors?	Please provide reason(s) for your answer to Question 3.	4. Should all new and replacement licensed HC be black in colour?	Please provide reason(s) for your answer to Question 4.	5. Should all HC have a Manchester crest displayed on the front doors of the vehicle? It is proposed that the crest, as seen at the top of this page, is used and would incorporate wording "Licensed by"	Please provide reason(s) for your answer to Question 5.	6. Are there other ways in which HC vehicles licensed by Manchester City Council can be distinguished in appearance and/or have such distinguishing marks to clearly identify the vehicle as an HC?	Please provide reason(s) for your answer to Question 6.
1	16/08/2013	No	As already stated, back to black. No adverts at all	Yes	For identification and safety	Yes	It would enhance the vehicle. It would also reassure the travelling public that the vehicle was licensed in Manchester and give them a feeling of greater safety.	No	
2	16/08/2013	Yes	Not every owner wishes to have an advert in vehicle so a radio advert is suitable as they are working for radio company	Yes	Black only but any other colour is OK	No	A crest would improve on a livery advert	No	Current highlight is sufficient
3	17/08/2013	No	makes the vehicle look tidy and unprofessional	Yes	all black with the council logo on the door and into be proud of this fantastic city	Yes	definitely best idea ever by licensing	Yes	City Council Logo on the front doors and all black in colour the best would be a shiny example to the country
4	17/08/2013	Yes		Yes		Yes			
5	17/08/2013	No	makes the hackney carriage vehicles look ugly and tidy	Yes	all one unified colour and black fits the vehicle perfectly	Yes	Yes very good idea makes them look part of the best city in the north west	Yes	They have the blue sign on the roof and with the crest on the doors what more is needed
6	18/08/2013	Yes	So the public can see what radio system the cab is on.	No	The travelling public like to get in a cab that is not black, the comments I get about my new black cab is what a change to get in a cab that is not black.	No	It is already on the plate so why go to more expense	No	No the public know a that a Manchester cab is a typical London style. The main problem is out of town hackney saloon cars with taxi roof signs on
7	18/08/2013	No	non beneficial for driver as phone operators may make them carry an add for non coverage	Yes	metallic cause problems when removing adverts.	No	discretion by nature a plate on the back of the cab is adequate	Yes	a yellow light on roof
8	18/08/2013	Yes	See previous answer	Yes	I would support a policy for all Hackney Carriages to be black in colour. If by introducing a black only policy is a non starter then I question your policy of only accepting Peugeot and Mercedes in black only. London whose lead we have always followed allow any colour for their fleet of Mercedes Hackney Carriages. I'm sure that the public have the same problems in identifying Peoria Hys from Hackney in London as they permit the same colour vehicles, but perhaps they have better enforcement and issue further penalties to a y vehicles caught violating outside the law. I would like Manchester to show an any colour policy to all Hackney vehicles as I don't believe a black only policy would ever be proposed. Please I'm here to be in white or silver but in a certain spectrum within white or silver. My proposal would be for Hackney to be any colour including white and silver but outside of this spectrum that it relates to Please Hys.	Yes	See previous answer	Yes	Bonness on all vehicles to be white in colour. As in Leeds.
9	19/08/2013	No		Yes	Classic image of hackney cab	No		No	Taxi advertising is a great income, this would affect advertising
10	20/08/2013	No		No		No		No	
11	20/08/2013	Yes	It helps the public to get in a radio cab they have booked	No	If there is a shortage of new (used) cabs the second choice is one in a different colour. The public know that Manchester has other colours	No	All the year Manchester has not had a crest on the doors, so we do not need them, the travelling public know a cab is a cab.	No	Leaves well alone no change is needed
12	22/08/2013	No	The radio company's need to advertise in a more appropriate manner	Yes	The proof is in the pudding most people will say "I'm getting a black cab" not a multi coloured advertising board home	Yes	To distinguish between Manchester licensed vehicles and all the new out of area hackneys that never know where they are going	No	
13	22/08/2013			No	the London taxis in any colour are easily distinguishable via and ET should be in black	Yes	hackney carriages stand out any way but having a crest is a good idea	No	
14	24/08/2013	No		Yes		No		No	
15	25/08/2013	Yes	public identification	Yes	makes it easier for public to identify, we are known as black cabs not silver or red cabs.	Yes	In these days where taxis from different local authorities appear to be able to operate as PH cars with impunity, we need as much unique markings as possible to differentiate us from these interlopers.	No	
16	27/08/2013	Yes	Helpful to customers	No	Only the new LTT models	Yes	robustly actively looks at the plates on the front and rear of the taxi, so this will make it easily visible	No	see Q4

Ref	Date Received	3. Should all non-licensed vehicles only be exempted from the new and revised rules on radio beacons and on radio beacons etc on the rear of vehicles?	4. Should all new and revised rules on radio beacons and on radio beacons etc on the rear of vehicles be incorporated into the new and revised rules on radio beacons and on radio beacons etc on the rear of vehicles?	5. Should all HIC have a radio beacon on the rear of the vehicle?	6. Are there other ways in which the new and revised rules on radio beacons and on radio beacons etc on the rear of vehicles could be distinguished in the new and revised rules on radio beacons and on radio beacons etc on the rear of vehicles?	7. Please provide reasons for your answer to Question 6.
17	20/06/2013	No	No	No	No	How many areas does a vehicle need to be identified as a radio beacon? It is the front and rear of the vehicle. It is not enough.
18	01/06/2013	No	No	No	No	However, if more was done to prevent private hire drivers from parking in highway spaces from seeking to be any different from the rest of the fleet, then it would be a good idea to have a radio beacon on the rear of the vehicle.
19	03/06/2013	No	No	No	No	However, if more was done to prevent private hire drivers from parking in highway spaces from seeking to be any different from the rest of the fleet, then it would be a good idea to have a radio beacon on the rear of the vehicle.
20	04/06/2013	No	Yes	Yes	No	However, if more was done to prevent private hire drivers from parking in highway spaces from seeking to be any different from the rest of the fleet, then it would be a good idea to have a radio beacon on the rear of the vehicle.
21	04/06/2013	No	No	No	Yes	Advancing in the bus paper
22	04/06/2013	No	No	No	No	The council has issued 3 manufacturers to give private hire vehicles the policy of a radio beacon on the rear of the vehicle.
23	05/06/2013	No	Yes	Yes	No	A radio cab that is black and has a clear advertisement for a radio beacon on the rear of the vehicle.
24	05/06/2013	No	No	No	Yes	Perhaps the police could be involved in the issue, as all vehicles be required to have a bright yellow banner.
25	06/06/2013	Yes	Yes	No	Yes	Barred and boot
26	06/06/2013	Yes	Yes	Yes	No	The private hire should not be uniform in colour and the vehicles removed so that the public can identify them. It may be a bit (public hire)
27	06/06/2013	Yes	No	No	No	Yes, a distinctive signature colour or pattern, with a distinctive visual identifier on the front doors that presents a clear and consistent image to the public. Modern philosophy. There are a great many, consistent and vibrant city centres.
28	12/06/2013	No	No	Yes	Yes	No
29	13/06/2013	No	Yes	Yes	No	No
30	20/06/2013	No	Yes	Yes	No	No
31	06/07/2013	No	Yes	Yes	No	No

Ref	Date Received	3. Should all new/replacement HC vehicles only be allowed to advertise their own radio base etc on the rear doors?	Please provide reason(s) for your answer to Question 3.	4. Should all new and replacement licensed HC be black in colour?	Please provide reason(s) for your answer to Question 4.	5. Should all HC have a Manchester crest displayed on the front doors of the vehicle? It is proposed that the crest, as seen at the top of this page, is used and would incorporate wording 'Licensed by'	Please provide reason(s) for your answer to Question 5.	6. Are there other ways in which HC vehicles licensed by Manchester City Council can be distinguished in appearance and/or have such distinguishing marks to clearly identify the vehicle as a HC?	Please provide reason(s) for your answer to Question 6.
34	25/11/2013	No		Yes	I think they should stick to the black cab identification as a Hackney carriage	Yes		Yes	It could say Hackney carriage licensed by and the Manchester crest
35	25/11/2013	No	Most drivers do not work on the radio	No	Many times I have had passengers who want to go in a certain colour of taxi. Many chauffeur companies use the colour black and so we will all look the same	No	Leaves the exterior for advertising. A crest could be used on the transparent glass/plastic partition in the vehicle	Yes	A sticker on 1 of the passenger windows of the partition between driver and passenger
36	25/11/2013	Yes	Private hire do so why not Hackney	Yes	More distinguishable	Yes	To stop out of town black cabs	Yes	Bigger plate number on front and council name in bright colours
37	01/12/2013	Yes	This is because there is more business and also you are helping your own radio base earn more money.	Yes	This is because then the environment looks more realer	Yes	Yes, to show that the taxi's are from Manchester and to promote Manchester as a whole.	No	
38	02/12/2013	No	The vehicles should remain available for a wide variety of brands, so that Manchester continues to be a visible city in which investing brands can promote their products and services.	No	The colour of the taxi will make little difference to passenger safety.	No	When hailing a taxi, few people look at the door - most people will look at the windows to engage the driver and to see if there is another passenger inside. Whilst it is important for passengers to be able to identify a licensed taxi, the door is not necessarily the best position for the identifier. The windscreen would be a better option for eye-level visibility.	Yes	In London the licensed Hackney Carriage taxis have identifiers in both the front and rear windows. This clear system seems to work well for both passenger and drivers in London and is simple to implement without compromising the paintwork of the taxi or the availability of taxi advertising space.
39	04/12/2013	No	There is no clear rationale for limiting the advertising from what is currently available	Yes	Keeping the vehicles black limits the possibility of confusion for potential passengers	Yes	Having the Manchester Crest helps to identify official taxis more easily	No	With the registration plates, lights and crest this should be sufficient for easy identification of officially licensed vehicles
40	06/12/2013	No	Not all drivers work for radio companies and they do not earn revenue for advertising radio circuits to already charge drivers for membership. Why should they give the radio companies free advertising and not earn from it?	No	A taxi should be available in any colour. The driver should be able to have a choice.	No	Identifiers can be placed inside the windows of the Taxis to indicate their status. An external crest can be removed from the body of a Taxi and used on rogue cabs easily	Yes	As in London, there is an identifier that each Cabrio has to have, it shows their Licence details and colour of badge. This scheme is working well in London so could be easily adopted in Manchester.
41	09/12/2013			Yes	It is good to make them uniform and better recognisable by customers	Yes	Good for recognition		
42	09/12/2013	No	As with all out of home advertising it's beauty is that it enables messages to go where people go making an effective, high frequency proposition	Yes	Tradition	No	I don't think that's entirely necessary. Consumers do tend to trust black cabs more than private hire	Yes	Just keep to the traditional black colour and have a light on top as they do now. You could look to use the driver window to provide details of the council licensing. When people are inside them they are more likely to have the time to consume the messaging.
43	11/12/2013	Yes		No		No		Yes	Clear visibility for Hackney Plate issued by the Council distinguishing it as a Hackney Vehicle
44	11/12/2013	No		No	Restricts a proprietor from buying 2nd hand vehicles	No	This would restrict full cab livery's	Yes	
45	11/12/2013			No	Drivers need the freedom to buy vehicles from other districts that allow other colours on their Hackney fleet. To apply a rigid Black only rule would be costly reducing choice and forcing drivers to have to respray vehicles when bought from other areas.	No	The plate is sufficient as it is and would add costs to setting up a vehicle if everyone needed to display crests that mean little to users.	Yes	Making sure the Hackney Licence Plate issued by the Council is easily distinguishable and is easily seen by customers.

Who is Ubiquitous and why are we communicating with you?

Ubiquitous Taxi Advertising

Managing Director Andrew Barnett founded Ubiquitous in 2005. His father helped invent advertising on taxis in London in 1958 and Andrew and the Ubiquitous Directors has been in the business since 1978.

Ubiquitous currently employs and retains over 50 staff and agents in England, Scotland and Wales and turned over £9.6m in 2011 out of a total estimated taxi advertising sector turnover of £16.6m. The nearest competitor, VeriFone, turned over £5.5m (estimated) in 2011. Most of the world's major brands use taxi advertising, including BA, Visa, Google, IBM, Sky, Microsoft and GE.

The company is innovative and progressive, being responsible for creating all of the currently available types of advertising formats on taxis, such as Livery and SuperSides. It has delivered the largest ever taxi advertising campaign with the current London Vodafone campaign of 1,000 Liveried taxis. It is also currently pioneering the development of Wi-Fi and Near Field Communication technology in taxis.

Taxi advertising takes place across most of the major cities where licensed taxi fleets exist. Ubiquitous covers over 15 of these, including the 5 key advertising Cities of London, Manchester, Glasgow, Edinburgh, Birmingham and Liverpool.

The 'stock' of taxis available to the company to post adverts onto amounts to over 5,000 vehicles and includes all the major taxi vehicle types such as the LTI TX, Mercedes Vito, Fiat Doblo, Euro Cab Peugeot E7 and Euro Cab Sharan.

Over the last three years, roughly £14.6m has been paid to taxi drivers and owners for carrying adverts on their vehicles.

What is the problem and what is at stake for Manchester?

Taxi Advertising Revenues by City in Order of Spend Per Capita (Draft 4/'12)

This is the annual income to the licensed taxi economy from Ubiquitous taxi advertising, then multiplied by 2 (as a conservative estimate of Ubiquitous having 50% of the market) to give a rough estimate of the comparative per capita income in each city. The aim is to provide evidence to those responsible for inward investment into these cities of their relative positions.

Manchester City Council
Licensing and Appeals Committee

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Sources: (pro rata) (All = Ubiqu x2)				
	2009/10	2010/11	2011/12	Total
London (7,200,000 – population) £1.75 per capita	£1.5m	£1.8m	£3m	£6.3m (£12.6m)
Manchester (420,000 – population) £1.46 per capita	£87,000	£85,800	£134,000	£306,800 (£613,600)
Edinburgh (450,000 – population) £1.40 per capita	£109,600	£118,700	£87,000	£315,300 (£630,600)
Liverpool (440,000 – population) 39p per capita	£35,800	£21,900	£27,500	£85,200 (£172,400)
Glasgow (560,000 – population) 33p per capita	£22,100	£44,300	£25,000	£91,400 (£182,800)
Birmingham (992,000 – population) 27p per capita	£48,500	£25,900	£62,000	£136,400 (£272,800)
Total UK investment in the licensed taxi trade over three years = Ubiquitous £7.3m All = £14.6m				

This equates to Ubiquitous creating roughly £2.4m investment annually into the licensed taxi trade.

The problem facing Manchester Council

How can we solve the safe passenger identification issue whilst retaining taxi advertising?

There are several methods of taxi identification currently in use. One example, is the London use of taxi identifiers in the front and rear windows, see example below:



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They can be either yellow or green, indicating the region that the taxis can work in. this system was brought in by TfL for similar reasons and has proved to be a success, whilst allowing taxi advertising to continue to enhance the trade.

Identifiers on the inside windows on the taxis are more permanent and less likely to be peeled off or damaged.

Therefore, the problem facing Manchester taxi trade is a loss of **£613,100** per annum. The recipients of this revenue are Manchester taxi drivers and the associated trade.

Manchester Council wants to make sure that licensed taxis are readily identifiable, as do Ubiquitous. The challenge is to do this in a way that ensures taxis are easily identifiable without compromising advertising revenue to the trade, much of which is used to help maintain the quality of the fleet.

How can we solve the 'safe passenger identification' issue whilst retaining taxi advertising?

There are several methods of Taxi identification currently in use. London use Taxi identifiers in the front and rear windows.

They can be either Yellow or Green, indicating the region that the taxis can work in.

This is a new system bought in by TfL for similar reasons and has proved to be a success.

Ubiquitous is the link between the Taxi industry and advertisers looking enhance their brands around the UK and recognised as the industry leader in Taxi advertising by clients and advertising agencies.

There will be a representative at the council meeting February to take and answer any questions. If any additional information is required in the interim, please contact;

Micky Harris
Director
mharris@ubiqtaxi.com
Office: 020 7291 3703

REF	POSTCODE	1. How do you know that a vehicle is a hackney carriage taxi (black cab)?	2. How do you know that a vehicle is a private hire vehicle?	3. How do you know that a hackney carriage vehicle is licensed by Manchester City Council?	4. Should our hackney carriage vehicles look different to hackney carriages from other councils?	5. If yes, how do you think they should look different? For example, a different colour, or a prominent logo	6. Every hackney carriage shows a unique licence number on plates on the front and back of the taxi. Do you think this number should also be shown on an illuminated box inside?
1	M19 3EL	Because it looks like a taxi?	Don't know	Don't know	Yes	Yellow like NYC	Yes
2	M219ge	It is black and of a certain make	The light on top	It is written inside the cab	No		No
3	OL11 2AL	Black cab	Badge next to the license plate on the back and usually some sort of motif on the side door panels.	The badge next to the license plate on the back of the vehicle	Yes	Different colour (burgandy/purple is teh councils colour) The logo should be something sophisticated and professional, such as the MCC logo on door panels.	No
4	m19 2pr	Due to the shape and colour.	Usually I have rung them or they have small signs on the bottom of their back and front bumpers.	Most taxi's have a sign stuck in either the front or back of the cab.	No		Yes
5	m23 1hj	id inside should state this	id in car display	id in car	Yes	a different colour	Yes
6	M19 1RT	Black cab / hackney carriages are very distinctive vehicles. They are easy to ideintfly from private cars.	Sign on the outside of the vehicle staitng the name of the taxi company.	A notice is usually displayed (but not always) on the inside of the cab. These notices need to be more visible so the public can read them easily and check the driver ID number. A notice explaining how the fare is calculated is also very important.	Yes	Some hackney carriages are not black and because of this it is not clear if it is a licensed cab or someone's private car. Don't feel confident using these cabs when they're not black.	Yes
7	M32 9RF	They are a traditional design, distinct from normal cars.	They are normal cars, usually with the companies logo/sign on them.	By the council registration plate.	No		Yes
8	M169RJ	Shape of car. Yellow light. Usually black	Yellow plates near number plates.	Yellow plates and ID inside	No		No
9	M19 3WS	Because of their distinctive shape and badge on the inside	They have a plate on them, next to the number plate	The badge will have this information on	No		No
10	M14 5PN	Black. Licensed by Manchester City Council plates Orange 'taxi free' sign	Licensed by MCC plates Yellow livery on bonnet	It says on the MCC plates	No		Yes
11	M20 6df	Orange light	Logo on side or licence on back	No idea	Yes	Different colour- e.g. Yellow to match the met	Yes
12	m9 6jw	Shape and colour of vehicle are very distinctive and recognisable.	Has a taxi plate and may have advertising signage for the company. Some vehicle are white or silver?	By reading the taxi plate for issuing council.	No		Yes
13	M16 8PN	Taxi sign on front and either 'traditional style' cab shape or black new style both with orange lights to show they are available for hire both have a Manchester taxi plate	White or silver saloon car with yellow stickers	They have a Manchester plate on the front and rear	Yes	Should not be saloons as some areas use. They need to be accessible for disabled users which other councils don't always have	Yes
14	M130PT	It's black	Don't know.	Don't know	Yes	Manchester city councils, logo on the front door.	Yes
15	M45 7PQ	The distinctive recognisable shape of a London Taxi	The silver/white car with official company name and Manchester City council identification stickers together with Private hire plate	Front and rear White licence plate with Manchester city council and number for identification	Yes	All black without adverts except for taxi company logo, however that may be difficult to justify with freedom of choice.	Yes
16	m9 5ff	unique designe	normal vehicle	plate	No		No
17	bb95lj	By a light	Yellow stickers on silver cars	Plate at the back	Yes	Manchester city council should bring back old plates which were easily identifiable with big manchester city council logo on black cabs plate. This was in colour	No
18	M19 2et	By hackney plate and car	With the plate and stickers on wings and back window	Find out on the plate	No		Yes
19	M23 2QJ	It display taxi	It has a sticker saying not insure u less book through the operator	It has the manchester badge	Yes	Prominent logo	Yes
20	M20 4XQ	By it's appearance	Because it is not a hackney cab.	I don't know	Yes	Yes prominent logo inside the cab	Yes
21	BI22sx	It as a for hire sign, and a plate with the cabs information on it	This vehicle should have the name of the firm he works for and it should clearly. Say advance bookings only	It as the Manchester plate on it	Yes	Any manufacturers colour	No
22	M1 2wh	Looks like a big black tank, look awful and make soooo much engine noise, 250 co2 level, how is that economical	They look alot better and sound alot quieter, and they have a yellow plate on front and back, there drivers wear uniforms and look professional	We just do, they park up anywhere like they own the road, illegal ranks	No		No
23	M16 7 gn	By the shape which is the black cab know for many years and words saying Taxi on the roof	Am not to sure nowadays as we see taxi as privet cars with the taxi roof sign but not even license by Manchester city council	By the plate number on the front of the cab or at the back saying Manchester city council	Yes	Prominent logo	No
24	m14 5pt	Normally the vehicle is a typical London Cab style vehicle,	Because PH are normal silver and white only	Normally have to look at the yellow license plate	Yes	I think a M/cr Corporate collour should be standardised and a prominent Manchester Logo	Yes
25	OI84eq	Taxi sign on the roof	Silver, the company logo	Black cab	Yes	Should all be black with a manchester logo with Hackney carriage number on it on both back doors	Yes
26	M23 1fd	With a plate	With plate	M-cr logo	Yes	Color	No
27	M167ly	The way they are is different from other cars.	Because they got a very big yellow sign.	the plate tells you that.	No		No
28	Sk63hd	The vehicles are easy to spot being bigger and they have a for hire sign	You know because they are covered in stickers with advertising for the companies and phone numbers.	Manchester plates.	No		No
29	M22 4EL	I think they're fairly distinctive, and easy to differentiate from Private Hire vehicles.	It SHOULD be white or silver, and have stickers on it to show that it's a Private Hire vehicle. It should also have a yellow plate. However, Rossendale badged cars DO NOT have these features and also often have 'Taxi' signs on their roof. These really nee	The plate number does this.	No		Yes
30	WA143EQ	Unique shape and yellow light	Your guess these days is as good as mine, No uniformity in colour shape or plates, some have Hackney carriage on their doors	You can only tell from the rear plate	Yes	Put consulsory yellow stickers on passenger door windows advising this is a licensed Manchester hackney carriage	No

REF	POSTCODE	1. How do you know that a vehicle is a hackney carriage taxi (black cab)?	2. How do you know that a vehicle is a private hire vehicle?	3. How do you know that a hackney carriage vehicle is licensed by Manchester City Council?	4. Should our hackney carriage vehicles look different to hackney carriages from other councils?	5. If yes, how do you think they should look different? For example, a different colour, or a prominent logo	6. Every hackney carriage shows a unique licence number on plates on the front and back of the taxi. Do you think this number should also be shown on an illuminated box inside?
31	M3 6BE	White licence plate	Yellow stickers and yellows licence plate	White licence plate	Yes	Should carry white bonnet stickers and remove all advertisements and a black cab should be black	Yes
32	M130sa	I look for a London black cab	I dnt know	I dnt know	Yes	They should be a certain color and yes they should be have council logos on the sides and back.	No
33	ol41aa	Lti icon	Saloon car or van	We don't it's hard to tell if we see a lti icon we think it's from the city of manchester	Yes	I think a logo should state were it's from	Yes
34	m21 9jd	shape	shape	plate front and back	Yes	prominent logo	Yes
35	M8 0lr	Man city number plate	Man city sitkers	Man city plate	Yes	No any type	No
36	M84wn	You can recognise a hackney carriage ie london type cab,mercedes vito, Peugeot E7 by the yellow hire light and taxi markings on the vito and E7	A manchester private hire vehicle is white or silver with bonnet,wing and window signs on. The council need to do something about the out of town hackney cars that have roof signs and advertise with yellow private hire company signs on. Manchester council	The plate is white and has the manchester logo and crest on it	No		No
37	m19 3np	if it is LTI	If it has got a yellow stickers	we dont	No	i dont mind as long as it take me from here to their	Yes
38	Ol113pw	Shape	Stickers	By the license plate but a lot of the public wouldnt know the difference	Yes	All blackcabs should be one colour like white or yellow	No
39	OL41EL	Black cabs are a unique design and shape.	Private hire vehicle are normal saloon cars.	It say manchester city council on plate.	No		No
40	OL10 4SG	It has a taxi sign on the roof	Confusing that all the cars are different colors	You have to look carefully at the licence	Yes	Big logos on the bonnet and doors with see through signs on the back windows	Yes
41	M192TY	It's shape and size	It looks like a private car	Taxi plate	No		No
42	sk44rf	Yellow taxi sign and the shape.	Normal type of car	The price card in the door panel	No		No
43	ol4 1nr	because shape	because shape	because license plate	Yes	prominent logo	Yes
44	SK4 2QN	Illuminated front Taxi sign and shape	The front big sticker on the bonnet and the two small stickers on the wings.	Hardly make a difference between the Taxi licensed by Manchester city council and other councils (Salford, Trafford, Stockport) unless you look at the plate in the back.	Yes	Colour may help to identify Taxis licensed by Manchester among others.	No
45		Yellow light	Usually they are cars with stickers of different firms	Reading it's plate	No	Please there is too much pirating going on by the private hire vehicles and hackney is losing out liscensing unit seemingly doing nothing there should be a proper force to administer the pirating private hire and their badoes should be revoked	No
46	M11pw	By its plate	By its plate	By its plate	Yes	Logo	No
47	wa3 2ps	lti vehicles	look for stickers on body	small id plate on front	Yes	prominent logo	Yes
48	Ol68de	With the taxi sign	With the stickers on	Do not know	Yes	Prominent logo	Yes
49	OL10 4JJ	Because it is the black london style	They are all silver sallon carsc	Council plates front and back	Yes	Make them all black no livery	Yes
50	M204RY	Because of it's Iconic looks	because it is suppose to be same as private car	Number at front and back with Manchester city council logo	No	Hackney should be same	No
51	M34 5AQ	The vehicles look like London taxis and have a taxi sign on the roof	I would have to physically look for a plate	I would have to check the plate	Yes	By means of a logo on their doors	No
52	m8 4ed	By logo taxi hire sign	By the colour silver/white and the wording private hire	The number plate	No		Yes
53	m9 6gp	By shape n clour with big taxi sign on	Hard to recognise	By number plate	Yes	Mostly same shape	No
54	M11 3hg	Because it has a "For hire sign on it's roof	Because it's usually a saloon car without the above roof sign. plus the licence plate differs from a Hackney cab. One states Hackney, the other states Private hire.	You don't necessarily know nowadays, because Manchester council has allowed Hackneys licensed outside Manchester to work as PH vehicles in the city. Thus confusing the travelling public.	Yes	Manchester Hackney carriages should only be approved vehicles, which allow for the carrying of wheelchairs, and NOT saloon cars.	Yes
55	m15 4eg	orange light and black in colour.	silver or white in colour with yellow strips	plate on rear bumper	Yes	possibly an MCC crest on or near the front or on the doors. Not ideal having the plate on the back bumper if you're getting in the door	Yes
56	M19 3DG	Colour and shape of the car and the orange taxi sign above the front windscreen.	Taxi plate on the rear bumper and the livery of the taxi company on the side doors.	I don't.	Yes	A prominent logo would be better than a different colour, unless it was the New York style cabs.	Yes
57	M40 1QJ	they are black and have a for hire sign	company logo and sign on	by the plate	Yes	prominent logo on the front	Yes
58	M40 1EY	Has MCC notice in the cab Driver has licence displayed	Unless there is a sign on it I don't know	MCC notice in cab	Yes	Either	No
59	M146DD	The white hackney plate and the vehicle is a LTI, Vito or Peugeot	The yellow private hire plate and not as specific as a hackney taxi	The HV number with the MCC logo	Yes	Prominent Logo for example the MCC coat of arms sticker/s on the front, back and sides of the vehicle or a combination of these.	No
60	M40 8LR	Colour and taxi plate.	Writing identifying company on vehicle and taxi plate.	It has Manchester on the plate I think.	Yes	Manchester logo on the door.	No
61	M21 9JX	By its licence plate(s)	By its licence plate(s)	By its licence plate(s)	Yes	By their licence plates	No
62	M34 3BF	Mainly because it is a black TX4 or those hideous Peugeotts or Mercs and that it has a yellow taxi light on its roof.	It will usually be any form of largish car. It should have a sign avertising the company on its roof and or stickers doing the same on its doors.	It should have a plate on at the front and rear stating a four figure number. With the Manchester City Councils logo.	Yes	Yes they should be a diffent colour or a combination of colours. Yellow and black would be good. It would make them more easily recognisable as they are in many other bigger European cities.	Yes
63	M33 6QE	Because of the type of vehicle and the light above the windscreen	By the stickers on side with the company name	By the plate by the number plate	Yes	Some form of logo eg city of coat of arms in a colour that stands out.	Yes

REF	badge number	plate number	Email	Are you happy for your response to be made public	Are you a driver or owner	Should the public easily recognise a hackney carriage licensed by us	Please give your reason for your answer	Should we change the rules on advertising	please say how we should change them
1			jhf@jfj.hi	No	driver	No		Yes	
2	3275	847	Shakahmed@talktalk.net	Yes	driver	No		Yes	
3	Hd9197	692	a-p-hardman@hotmail.com	No	driver	Yes	There are too many out of area hackneys driving around the city with Taxi signs illuminated confusing the public.ie :- rossendale, west Linley ,	No	
4			saghirhussain786@gmail.com	Yes	driver	No	They already had more than enough information on them.	No	
5	HD 0091	Plate no. 877	Paul-mccormick@hotmail.co.uk	Yes	driver and owner	Yes	Being able to identify a Manchester cab will place the out of town ' illegal cabs ' who chance their arm by coming into Manchester where they know enforcement is practically nil to work, at a distinct disadvantage.	Yes	Choose a Manchester colour and have all cabs in that colour. It may be better to have the cabs in one colour and the bonnet or roof in a contrasting colour. Any combination that will distinguish a Manchester cab from the rest. A Manchester corporation cre

REF	Should vehicles be allowed to advertise their own radio base	Please give your reason for your answer	Should all hackney carriage vehicles be black	Please give your reason for your answer	Should all vehicles have the words 'Licensed by'	Please give your reason for your answer	Can you suggest any other ways	Do you think we should ban adverts	Please give your reason for your answer
1	No		Yes		No			No	
2	No		Yes		Yes			Yes	
3	Yes	It helps the public recognise the firm they booked.	Yes	National icon. Black	No	Most people don't know the Manchester city council crest.	Probably stickers in the passenger windows.	Yes	
4	No	Not just that, all the other advertising should be stopped.	No	Not just black.	No	Texi should have less advertisement because we want to travel in privacy .The more information you have on taxi. The more look on to them ans read that.	I think hatchback can should be allowed not just saloon. Other colours should allowed not just white and silver.	Yes	People looks at things before they buy them.
5	Yes	Yes but keep it small and neat perhaps of a similar size and design to Radio Cabs of London. I don't like to see it plastered all over the body shell.	No	Not necessarily. I would prefer a distinct colouring perhaps as Leeds have perfected.	No	I would prefer just to have a Manchester City Council Logo. I don't think it is necessary to have the words licensed by.	No I can't, but anything would be an improvement to the present state of affairs.	Yes	I would ban all advertising.

REF	any other comments about adverts	Do you think the vehicles licence number should show on an illuminated box	Please give your reason for your answer	IF 'YES' Should it be compulsory	Please give your reason for your answer
1		Yes		No	
2		No		No	
3		Yes	People would be attracted to the light, and it would probably be the first thing they remember about there journey	Yes	As above, but should be compulsory in all private hire vehicles also across the whole licensed fleet of Manchester city council.
4		No	There's no need for that. Video recording would be much better option.	No	
5	The amount paid by advertisers is too poor to attract me to have adverts put on any cab that I own. I've also noticed that adverts cover a multitude of sins on the bodywork that otherwise would be obvious when a cab goes for test which without the advert	Yes	Complaints received by the council are of little use unless you know the plate number relating to the complaint. Passengers have little chance of reading the number which is currently displayed inside the cab written in marker pen. It is not illuminated.	Yes	As an owner I see it as an investment so that when the a City Council receive a complaint it is hoped that the passenger may remember the number as they will have been staring at it at least for some part of the journey. At the moment for passengers to ei

1. How do you know that a vehicle is a Hackney Carriage (black cab)
2. How do you know that a vehicle is a Private Hire vehicle.
3. How do you know that a Hackney Carriage vehicle is licensed by Manchester City Council
4. Should our Hackney Carriage vehicles look different to Hackney Carriages from over Councils
5. If Yes, how do you think they should look different ? For example, a different colour or a prominent logo.
6. Every Hackney Carriage shows a unique licence number on plates on the front and back of the taxi. Do you think this number should also be shown on an illuminated box inside.

Pages 47 to 66 have been redacted at the request of the information provider

Manchester City Council

Hackney Carriage Vehicle Type

Policy

Hackney Carriages licensed within Manchester must conform to the design criteria specified by the Manchester Conditions of Fitness (CoF).

Mercedes Vito Taxi

On 27 October 2008 the Licensing and Appeals Committee determined that the current design and appearance of the Vito Taxi and standard Vito is such that the vehicles are not easily distinguishable and additional policy and conditions were required to ensure a differential between the two types of licensed vehicle.

In relation to any application for a hackney carriage proprietor's licence relating to a Mercedes Vito taxi the City Council have introduced a specific policy relating to the appearance of the vehicle namely

- (i) The vehicle must be black or completely covered by full advertising livery; and
- (ii) The vehicle must display the manufacturer's taxi signage along the side of the vehicle

Conditions will be attached to any such licences, which are granted to ensure that the differential in appearance is maintained throughout the duration of the licence.

Conditions relating to the Mercedes Vito Taxi

The proprietor shall ensure that the vehicle remains Black in colour throughout the duration of the licence.

The proprietor shall ensure that the manufacturer's taxi signage is displayed along both sides of the vehicle, except where the vehicle is covered by full livery.

The proprietor shall ensure that the manufacturer's taxi signage is maintained in a clean and legible condition.



"Les Reid"
<les3110@gmail.com>
28/09/2014 11:43

To "" <cllr.s.ali@manchester.gov.uk>, ""
<cllr.c.austin@manchester.gov.uk>, ""
<cllr.s.collins@manchester.gov.uk>, ""

cc

bcc

Subject Licensing Sub, September 29.

Dear Cllr

I write to you concerning a matter under consideration for Licensing Sub Committee on Monday 29 September.

The item of concern is the high visibility light, which is proposed to be recommended, to be fitted in the rear of Hackney Carriages.

The light proposed to you, by the Licensing Officer's is illegal. I refer to the following.

The Road Vehicles Lighting Regulations 1989

Section 11

(2) No vehicle shall be fitted with a lamp which is capable of showing any light to the rear, other than a red light,

I am surprised that the Licensing Officers are recommending this light, as recently as the 28 July last, the Licensing Unit were made aware of the 1989 regulations.

Cllr. Chappel had to intercede on our behalf to remove unlawful lights from a City Centre Private Hire Companies vehicles.

I note that the Company sponsoring this application are Mantax Radiio Taxis.

I have reason to doubt their policies on public safety They have adverts fitted to the doors their vehicles, all well and good. They also have the same advert and phone number displayed on Hackney Vehicles licensed by other Authorities. They own vehicles licensed by other authorities (one attached). They do this because it is cheaper to license in other area's than Manchester.

The situation exists where a customer order's a Cab, which they believe is Licensed by Manchester and yet they get a Cab licensed elsewhere. Whilst that may be legal, I think it unfair to the traveling public who expect a Manchester vehicle, operating on Manchester's fare structure and higher safety standards.

I would respectfully suggest that adverts advertising on Manchester Hackneys are removed to avoid the Public being misled.

On the matter of the light box, I hope you reject this application on safety grounds.

Yours.

L Reid.

Manchester Hackney Driver HD8764.



salfrod.JPG

