Horse Drawn Carriages in Oxford

This document has been produced on behalf of representatives of a joint trades committee made up of Hackney Carriage & Private Hire trades in Oxford.

Concern was raised at a joint trades meeting on May 31st 2011 where the prospect of Horse Drawn Carriage licensing was announced by taxi licensing officials, there had up to this point in time, been no consultation with either trade on this subject since 2009.

During the early part of 2011, many local regulations regarding the licensing of taxi, private hire drivers & their vehicles, had been significantly enhanced, the exercise resulted in the long overdue tightening up of control over the type of person & vehicle that would be permitted to obtain a license, taking those tighter controls into account, representatives from both trades are at a loss as to how or why taxi licensing officials have then made approaches to Defra with the view to actually ‘relaxing’ controls which would result in Horse drawn Carriages & their drivers being permitted to offer hire & reward services in Oxford, an absolute attempt at dual standards.

The trade organisations also are at a loss as to why Taxi Licensing fees have apparently been used in order to achieve this ‘relaxation’ of controls for one service provider without the applicant being asked to lodge some financial deposit, we are of the opinion that whilst one door has been closed on sub-standard operations in Oxford, the back door will now be opened for all & sundry to apply to operate sub standard services of many different types. Once opened, with today’s culture of legal challenge, its always an impossible task to close the door to all other types of operations.

This situation has happened before in Oxford & those who can remember the previous ‘small bus’ fiasco of the 1990’s, where one operator took advantage of a relaxation in controls, will also remember how it led to Oxford being flooded with over 140 unlicensed saloon vehicles & their drivers operating Hire & Reward Service without being properly vetted or licensed, legislators (Defa) eventually realised that they had presented themselves with more safety issues than they had ever imagined, had to eventually close the loopholes that they had unwittingly allowed, the joint trades committee are of the opinion that this is about to happen again if the licensing of horse drawn carriages is permitted in Oxford, others would follow & chaos would soon be upon our streets once again.

We are deeply concerned over the effects such an operation would have on the already congested streets and public transport corridors such as bus lanes, horse drawn carriages would (because they would be considered to be an ‘omnibus’ by Defra) be permitted to use bus/taxi priority routes before & during their operation each day, presumably the operation would need to access the city from the outskirts of Oxford & would therefore be able to travel the whole length of one or more of the major arterial routes into Oxford, can you imagine a horse drawn carriage, travelling at around five miles per hour along the whole of length of the Woodstock or Banbury Road bus/taxi lanes? normal traffic flows would actually be flowing faster during rush hour than buses & taxis who were following horse drawn carriages in bus lanes, a facility originally designed to allow less congested access into the city not slower, to license one of these unusual operations, would we feel, open the floodgates to many other unusual forms of hire & reward transport, once open, refusal to allow others would become extremely difficult to refuse or control.

Of the existing 700+ hackney carriage & private hire vehicles, all, are required to comply with disability & elderly access regulations, carry fire extinguishers, first aid kits, weather resistant bodywork, heating systems, the list goes on, exactly how many of those requirements would be applied in order to obtain a horse drawn carriage license? Which section of Oxford City Council would regulate & enforce the regulations, how would the cost of their enforcement be separately accounted for by whichever office dealt with the operation?

Continued on page two......
If it was decided that the taxi licensing office were to regulate & enforce the horse drawn carriage, there is no doubt that additional staff would be needed in that section, if not, then the service already provided to the taxi & private hire operators & drivers would be reduced, would the 'alternative' hire & reward service operators pay licence fees which reflected the actual/true cost of that process as do the two existing services? Under existing city council resolution & with present financial restrictions it would have to, then would the applicant be prepared to pay the high fees that this would require?

Although enforcement of the existing trades has been increased over the past few months, it is still not sufficient, any additional drain on licensing officer's time would reduce existing levels of services & enforcement offered to existing license holders, we would then be applying for a reduction in license fees.

We hereby object in the strongest possible terms to the licensing of horse drawn carriages in Oxford.

[Signature]
City of Oxford Licensed Taxicab Association

[Stamp]
Licensing Authority
Oxford City Council
14 JUN 2011
Received