

BABERGH DISTRICT COUNCIL

FROM: HEAD OF NATURAL AND BUILT ENVIRONMENT

REPORT NUMBER G205

TO: LICENSING AND APPEALS COMMITTEE

DATE OF MEETING: 28 February 2008

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976
PRIVATE HIRE LICENSING OF STRETCHED LIMOUSINE TYPE VEHICLES

1. PURPOSE OF REPORT

- 1.1 The purpose of this report is to update Committee on the relevant issues surrounding the licensing requirements for stretched limousine type vehicles, following the recent publication of further guidance from the Department for Transport on 28 January 2008.
- 1.2 This report also outlines a proposed private hire licensing policy and scheme for members to consider which would bring some of the 8 passenger seat or less vehicles within the private hire licensing regime administered by Babergh District Council. Vehicles adapted for the carriage of more than 8 passengers would fall outside of any local licensing controls and would need to be inspected and licensed under Public Service Vehicle (PSV) arrangements by the Traffic Commissioners of the Vehicle Operator Standards Agency (VOSA).

2. RECOMMENDATION TO STRATEGY COMMITTEE

- 2.1 That the policy, scheme and fee structure for licensing stretched limousine type vehicles attached as Appendices 1 to 4 be adopted with effect from 1 April 2008.

3. FINANCIAL IMPLICATIONS

- 3.1 There are costs associated with the licensing, enforcement, hearings, appeals and development of local policies and procedures required for these vehicles. They present a greater risk and will require greater scrutiny than regular private hire vehicles.
- 3.2 The relevant legislation provides for full cost recovery through the setting of appropriate licence fees.

4. RISK MANAGEMENT

Risk Description	Likelihood	Seriousness or Impact	Mitigation Measures
The main issues associated with vehicle, driver and operator licensing concern public protection. Public safety and confidence could be compromised by the unlawful use of stretched limousines.	Significant	Critical	Regular review of licensing procedures, policy and strategies, against all available legislation, regulations, guidelines and best practice.

5. **KEY INFORMATION**

- 5.1 The powers to licence Private Hire Vehicles are contained within Part II of the Local Government (Miscellaneous Provisions) Act 1976. Specifically section 48(1) of the 1976 Act requires that a district Council shall not grant a private hire vehicle licence unless it is satisfied that the vehicle is:
- (a) suitable in type, size and design for use as a private hire vehicle;
 - (b) not of such design and appearance as to lead any person to believe that the vehicle is a hackney carriage
 - (c) in a suitable mechanical condition
 - (d) safe; and comfortable.
- 5.2 There are a number of important points that arise from this lengthy provision, so it is vital that the Council address these suitability issues by means of adequate local licensing requirements, vehicle testing and conditions. The powers to create private hire vehicle licence conditions are contained within section 48(2) of the 1976 Act and providing they are reasonable and proportionate the Council has wide ranging discretion concerning the setting of vehicle conditions.
- 5.3 In addition to any licence granted for a Private Hire vehicle, the driver(s) and operator of the vehicle would need to be licensed by the same Authority. Babergh District Council already has procedures in place for the licensing of drivers and operators and these would be unaffected by any special local arrangements to licence qualifying stretched limousines (with the possible exception of drivers requiring C1 category driving licence entitlement to drive medium sized vehicles above 3500kg). The applicant for any operator licence would also need to check with the Planning Department (and Housing if they are a Council tenant) to ensure that they have or acquire the correct planning consent to operate their business from their specified operating base (although this can not be a condition or pre-requisite of licence as it would be a separate planning matter under separate legislation).
- 5.4 In accordance with the recommendation of the Licensing and Appeals Committee from its meeting of 18 January 2007, Strategy Committee resolved at its meeting on 08 March 2007 (report F157 refers) that the Council should await the publication of further detailed national guidance from the Department for Transport on the issues surrounding the licensing of stretched limousines before considering the matter further, and that in the meantime the Council's current policy that such vehicles be deemed unsuitable for licensing be continued. Report F157 can be accessed electronically. Any Member wishing to receive a hard copy of this report is asked to contact Democratic Services.
- 5.5 The Chief Executive has also raised concerns over the licensing of these vehicles with the Suffolk Local Government Association (SLGA), and accordingly the SLGA wrote to the Government requiring the urgent issue of further national guidance. Licensing Officers have also assessed the licensing requirements of neighbouring Local Authorities, in particular Ipswich Borough Council and Colchester Borough Council. The Suffolk Licensing Officer Group (SLOG) will also be exploring the issues in further detail at sub-group level in the coming weeks and months.

- 5.6 On 28 January 2008 the Department for Transport issued further guidance on the licensing of stretched limousines. Although this document is still of limited value to local Licensing Authorities, and is primarily addressing issues relating to the larger (8 seater plus) vehicles that would in any event fall outside of any local Private Hire licensing arrangements, there is some useful information contained within the guidance that should help to direct development of a local Private Hire policy.
- 5.7 In general terms the following situation now exists:
- (a) Stretched limousine proprietors previously dependant on '7 day contract' exemptions from Private Hire licensing can no longer rely on this as the relevant exemption was repealed with effect from 28 January 2008 by the Road Safety Act 2006.
 - (b) Proprietors and operators of stretched limousines with bench seating where it is hard to determine whether the vehicle seats 8-10 passengers will not be able to rely on a self-declaration that the vehicle will only be used for 8 passengers (thus this will put such vehicles outside of the Private Hire regime)
 - (c) Stretched limousines will either require Single Vehicle Approval (SVA) or Certificate of Initial Fitness (COIF)/GB construction compliance testing by VOSA when they enter the UK. It is however unclear whether vehicles already in the UK (it is estimated there are more than 11,000) that have not been tested under either regime, due to importation loopholes relating to use and lack of a mandatory national testing programme to this point, will be required to get certificated retrospectively. In view of the fact that many of the vehicles already in the UK would fall short of the testing requirements it is anticipated that this could be a significant issue, so it is considered reasonable that Babergh require sight of a valid SVA certificate as a pre-requisite to consideration of a licence.
 - (d) There are only two federally approved conversion programmes in the USA for stretching standard vehicles and these are Ford Lincoln Qualified Vehicle Modifiers (QVM) and Cadillac Master Coachbuilders (CMC). It is proposed that Babergh only consider the grant of a licence to vehicles that have been converted under either of these programmes.
 - (e) It should be borne in mind that these vehicles are unlikely to be used in the same way, or as frequently, as regular private hire, and will primarily be 'special event' vehicles taking parties of hirers to race days, hen and stag night venues, birthday venues, bars and clubs, airports, shopping excursions, sightseeing tours, city trips etc
- 5.8 There are significant technical concerns and other complex issues that exist surrounding the use, testing and licensing of stretched limousine vehicles. Babergh officers have made extensive enquiries with the Department for Transport, VOSA, neighbouring councils, test technicians, vehicle examiners, and also the limo trade itself. This has resulted in the development of a proposed local licensing scheme that is as stringent and robust as possible.

- 5.9 The proposed policy and scheme is attached as Appendices 1 to 4. It should be noted that this would be a starting point for licensing of these vehicles and would be kept under constant review and revision, based on emerging best practice, further guidance and closer working with neighbouring Licensing Authorities. It is clear that many Councils have opted to licence these vehicles without getting into the depth and detail that Babergh officers feel is necessary to develop a strong and thorough licensing and testing regime.
- 5.10 Unlicensed Stretched limousines with eight passenger seats or less or those falling short of local licensing requirements would need to be enforced against and prosecuted by Babergh District Council as necessary, for offences relating to unlawful use. Any issues relating to the use of a particular premises as a base for private hire vehicles would need to be investigated and enforced against under planning legislation. Vehicles used solely for wedding and/or funerals remain exempt from any Private Hire licensing requirements.
- 5.11 In terms of the licence fees payable for a private hire vehicle (stretched limousine) licence, it is proposed that this should be set at a higher level than for 'standard' vehicles due to the considerable amount of additional administration, policy, monitoring, testing, enforcement and legal work associated with these specialist vehicles. Fees should be reasonable and limited as far as possible to cost recovery. The licence fees proposed are as referred to within the recommendation of 2.2 of this report and specified within Appendix 4, and would be inclusive of fees for vehicle testing and internal plates.
- 5.12 It is anticipated that, irrespective of any licensing scheme adopted by Babergh District Council, there will only be a handful of vehicles in use in the district that Babergh would be able to licence. Most of the vehicles in use seat, or could seat, more than 8 passengers and also may not be able to provide SVA, QVM or CMC certification, so local licensing will still not solve all problems associated with the use of this type of vehicle. It could however have positive benefits in particular ensuring that drivers are thoroughly vetted and that those vehicles that are licensed are maintained to a higher standard. Recent enquiries revealed that Ipswich Borough Council only licence two stretched vehicles and Colchester Borough Council have four.
- 5.13 Enquiries have also been made with one of the Council's existing approved testing stations, that currently conduct the specialist examination of larger wheelchair/disabled access vehicles, and they have confirmed that they have the necessary facilities and expertise to conduct testing of stretched limousines on behalf of Babergh District Council. This could provide a preliminary solution, with longer term possibilities being having the vehicles tested by neighbouring Council's test examiners or 'in-house' inspection at any future Babergh operated Council transport depot.

6. APPENDICES

- (a) Appendix 1 - Draft licensing criteria and conditions for stretched limousines
- (b) Appendix 2 - Draft application form for PHV (Stretched Limousines)
- (c) Appendix 3 - Draft vehicle examination inspection report for Stretched Limousines
- (d) Appendix 4 - Proposed licence fees payable for PHV (Stretched Limousines)
- (e) Appendix 5 - Department for Transport Guidance issued 28 January 2008

7. BACKGROUND PAPERS REFERRED TO

None.

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LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976

**PRIVATE HIRE LICENSING CONDITIONS & CRITERIA:
STRETCHED LIMOUSINE TYPE VEHICLES****A: GENERAL (PLEASE READ CAREFULLY PRIOR TO SUBMITTING AN APPLICATION):****1: Documentation and certification:**

- 1.1 In respect of American and other Stretched Limousines there will be a maximum age limit of 6 years from the date of manufacture / conversion for any vehicle to be licensed for the first time. A vehicle may be continuously licensed beyond this age limit provided it is able to pass the Council's mechanical examination. Only vehicles which have been converted under either the Ford Lincoln **Qualified Vehicle Modifier (QVM)** programme or the **Cadillac Master Coachbuilder (CMC)** programmes will be acceptable for consideration of a vehicle licence. Where there is evidence that a vehicle has been significantly modified or altered since QVM or CMC programme conversion, the Council will normally refuse an application to licence the vehicle. Stretch conversions longer than 120 inches under the QVM programme or longer than 130 inches under the CMC programme will not be considered suitable for licensing.
- 1.2 When presented for licensing for the first time the applicant for the vehicle licence will need to verify certification under the Single Vehicle Approval (SVA) scheme. The SVA certification document, together with the declaration completed at the time of SVA certification, will need to be produced to the Licensing Officer. The Council will normally check SVA certification validity with DVLA and/or VOSA. Where DVLA and/or VOSA are unable to verify the validity of any SVA certification presented to the Council then a licence will normally not be granted for the vehicle.
- 1.3 It will be the vehicle proprietor's responsibility to obtain and provide all necessary documentation to support the providence of the vehicle to the satisfaction of the Council.

2: Passengers and seating:

- 2.1 The licensing of any vehicle will be dependant upon the Council being satisfied that the vehicle is suitable in size, type and design for use as a Private Hire Vehicle (as required by section 48(1) of the Local Government (Miscellaneous Provisions) Act 1976) and the number of passengers which the vehicle is licensed to carry will in all cases be subject to the discretion of the Council. Vehicles with more than 8 passenger seats, or which could seat more than 8 passengers, can not be licensed as Private Hire and would need to be assessed and licensed under Public Service Vehicle (PSV) licensing arrangements administered by the Traffic Commissioner at VOSA (Vehicle Operator Standards Agency). For assessment of seating capacity it shall ordinarily be deemed that one passenger seat is equal to 400mm in width.
- 2.2 Seat belts must be of such type-approval and fitting so as to be compliant with all relevant legislation/regulations. There is no legal requirement to fit seat belts on sideways-facing seats (i.e those on sideways bench seating).

3: Vehicle testing and examination:

- 3.1 Before being mechanically examined for licensing as a Private Hire (Stretched Limousine) Vehicle, an appointment must be made with the Licensing Office for a preliminary inspection of the vehicle to ascertain whether it complies in general terms with the requirements for private hire licensing. The vehicle proprietor will attend this preliminary inspection as instructed by Licensing Officers. When a vehicle is submitted for inspection it shall be in a good and clean condition and the engine, chassis, body, wheels fittings, tyres, furniture and all parts must be in good repair and order. This initial general suitability assessment will NOT provide any assurance to the proprietor that a licence will subsequently be issued for the vehicle.

3.2 A Private Hire (Stretched Limousine) Vehicle will be required to be submitted for mechanical examination every six months (and three times per annum if it is considered reasonably necessary) and when presented for mechanical examination at the Council's authorised testing station the proprietor will ensure that the service record, for the previous 12 months, giving details of servicing and any replacement parts fitted will be available for inspection if required. The Council will specify which authorised testing station will conduct the mechanical examination of the vehicle.

4: Vehicle insurance, V5 registration and MOT:

4.1 Before a licence is considered for the vehicle the proprietor must provide documentary evidence of a valid policy of vehicle insurance covering all use of the vehicle for hire or reward/private hire on which the terms of cover taken out should also ordinarily include:

- (a) unlimited indemnity for injury and death to passengers (whilst entering into, riding in or dismounting from the vehicle) and other third parties;
- (b) adequate indemnity for damage to third party property - other than that being carried in or on the insured vehicle; and
- (c) adequate cover for damage to property belonging to persons being carried in the insured vehicle.

The Council will ordinarily contact insurance providers and brokers to verify the validity of insurance cover. Where a cover note is provided as documentary evidence of insurance, it is the responsibility of the policy holder to maintain/renew the policy during the currency of any licence, and provide the Council with follow-on certificates and/or cover notes as they become due.

4.2 Before a licence is considered for the vehicle the proprietor must provide the Licensing Officer with a V5 registration document that is consistent with the vehicle presented for licensing. Where a V5 is provided that identifies any discrepancy between the vehicle specified in the document and the vehicle presented for licensing, a licence can not normally be granted. The Council may make further enquiries with DVLA to verify the details of any V5 document presented with, or prior to, an application.

4.3 A current MOT certificate must be provided to the Council for the vehicle before a licence may be considered. It is the responsibility of the proprietor of the vehicle to provide follow-on certificates to the Council as they become due.

4.4 In the event of the MOT test certificate or insurance cover on the vehicle being cancelled, expiring or failing to cover the use to which the vehicle is being put, then the vehicle shall not be used until appropriate cover is reinstated and the Licensing Office shall be informed immediately.

5: Maintenance, servicing and accidents/repairs:

5.1 The proprietor(s) and operator(s) of the vehicle must ensure that the vehicle is adequately and regularly maintained and serviced during the validity of its licence, and the vehicle must be capable of passing an MOT and PHV test inspection at ANY time. The proprietor(s) and operator(s) of the vehicle must ensure that all components of the vehicle's construction are regularly and adequately checked and satisfactorily maintained with the correct/specialist/heavy-duty spare parts, including those elements of the vehicle such as axles, chassis, shock absorbers and suspension, steering components, brake systems and tyres that may be under increased stresses and load bearing than 'standard' type vehicle constructions.

5.2 The Council requires all proprietors and operators of stretched vehicles to ensure that public safety is given their utmost priority, and to be vigilant to ensure that under no circumstances sub-standard, incorrect or inadequate replacement parts are used for the licensed vehicle. For example using tyres with an inappropriate load bearing ratio, or inadequate braking, transmission or steering components could lead to a serious accident. Replacement parts should be of such design, specification, manufacture and durability so as to be entirely fit for purpose.

- 5.3 Any accident or damage (however slight) to the vehicle, or any incident involving the use of the vehicle, MUST be reported to the Council within 72 hours of the occurrence thereof. The proprietor must inform the Licensing Office immediately upon satisfactory completion of any repairs. Any vehicle off the road for repairs for more than one calendar month will normally require a further PHV test before resuming operation.
- 5.4 Compliance checks may be made at any time by an authorised officer of the Council, Police or VOSA. Should a licensed stretched vehicle at any time be found to fall below a condition that is considered by the Council as safe and suitable for licensing, the licence may be immediately suspended or revoked.

6: Drivers:

- 6.1 All drivers of the vehicle must be in possession of a full driving licence issued by DVLA of the correct category for the appropriate class of vehicle. It should be noted that certain age restrictions apply to certain categories and weights of vehicle. Category B entitlement would normally be sufficient for vehicles up to a gross weight of 3500kg (3.5 tonnes). If you have any enquiries concerning driving licence entitlement please contact DVLA on 01792 772151.
- 6.2 Any person driving the licensed vehicle shall obtain a combined HC/PHV drivers' licence from the Council (even if they are only driving it for social, domestic or pleasure type use) and operators shall ensure that drivers of the vehicle receive adequate training, supervision and support to ensure that they are able to safely drive the vehicle. Due to the specialist nature of stretched vehicles, the Council strongly recommends that drivers of stretched limousines attain an advanced driving accreditation.
- 6.3 The policy of motor insurance obtained by the proprietor must adequately cover all drivers use of the vehicle.

7: CCTV and security installations:

- 7.1 No form of CCTV camera (including 'dummy' cameras) or other security device is to be installed in the vehicle without the prior written consent of the Council.

8: Sale and consumption of alcohol:

- 8.1 No alcohol shall be sold in or from the vehicle unless an appropriate authorisation under the Licensing Act 2003 is in effect. For these purposes a sale is deemed to be made where a 'complimentary' alcoholic drink is provided as part of a fee-paying hiring of the vehicle.
- 8.2 The proprietor and operator of the vehicle shall take all reasonable steps to ensure that the driver and the hirers of the vehicle are advised that under 18's are not permitted to consume alcohol in the licensed vehicle, and observe all other relevant requirements of the Licensing Act 2003.

9: Private Hire Exemptions:

- 9.1 Vehicles used solely for wedding and/or funerals are exempt from local PHV licensing requirements. Vehicles carrying 8 or less passengers at separate fares, or as a small part (i.e less than 10%) of a larger bus business, will normally require licensing by VOSA under PSV arrangements and can not therefore be licensed by the Council as Private Hire. Previous '7 day contract' exemptions from private hire licensing have been repealed with effect from 28 January 2008 by the provisions of the Road Safety Act 2006.

B: VEHICLE SPECIFICATION

Within the general pre-requisites, criteria and conditions required, each vehicle licence application shall be assessed individually and on merit. In making a determination of a vehicle's suitability the Council will consider all of the factors referred to within this document, and any other relevant legislation or guidance, when determining (pursuant to section 48 of the Local Government (Miscellaneous Provisions) Act 1976) whether a vehicle is suitable in type, size, design, mechanical condition, safety and comfort to be granted a private hire licence. Normally, only vehicles complying with the following requirements will be considered for licensing as a Private Hire (Stretched Limousine) Vehicle:

- (a) Vehicles not capable of carrying more than 8 passengers in addition to the driver (for the avoidance of doubt a baby or child of whatever age each count as one person);
- (b) Vehicles fitted with at least 4 doors and 4 wheels.
- (c) All bodywork and paintwork must be to a very high standard with no dents or signs of corrosion.
- (d) Vehicles must have adequate space for securely storing luggage within the vehicle.
- (e) The vehicle shall be equipped at all times with seat belts of an acceptable type in respect of every seat which can be used for the carriage of passengers. Seat belts must comply with current legislation and be maintained in good working order at all times.
- (f) The vehicle must have a serviceable spare wheel and tyre together with the proper tools and equipment to change the wheel if and when needed.
- (g) All tyres (including the spare) must be suitable for the vehicle and of adequate load bearing capability for the maximum fully loaded weight of the vehicle
- (h) The door windows must be so constructed that they can be easily lowered or raised by the hirer and must be fitted with an appropriate means to enable them to be opened and kept open or partly opened as desired by the hirer. The windows must be suitably glazed, free from rattle and must be wind and water tight.
- (i) The seats shall be covered with leather or other appropriate materials and must be properly upholstered and maintained in good condition, free from tears or marks.
- (j) The fittings and furniture of the vehicle must be well maintained in a good and clean condition.
- (k) No roof fitting will normally be permitted other than an aerial to receive radio transmissions.
- (l) The vehicle must be equipped with at least three rear view mirrors, one of which shall be fitted internally in a position where the driver can easily view the interior of the vehicle, the other two shall be fitted externally on the nearside and offside of the vehicle.
- (m) The vehicle shall keep two fire extinguishers and a first aid kit (of type/contents as specified within the standard PHV conditions of licence).
 - Fire Extinguishers: One should be mounted on brackets, in a convenient position in the drivers compartment, if practical, or in a position where it is readily accessible by the driver. The other should be similarly mounted within the boot of the vehicle, so as to be readily available at all times.
 - First Aid Kit: Should be carried in such a position in the vehicle as to be readily visible and available for immediate use by a qualified person or a volunteer in an emergency. If the design of the vehicle is such that it cannot be carried in a position where it is easily visible, then a sign shall be displayed on the vehicle dashboard or some other prominent position indicating the position of the kit:
- (n) If granted a licence, the vehicle will be issued with an exemption certificate from displaying the private hire plate under Section 75(3) of the Local Government (Miscellaneous Provisions) Act 1976. The two Council issued Private Hire (Stretched Limousine) Vehicle internal plates will be required to be displayed in the windscreen of the licensed vehicle and on the dashboard. A duplicate copy of the vehicle licence will also be issued by the Council and this must be retained in the vehicle at all times by the proprietor/operator/driver of the vehicle and must be produced upon request to an authorised officer of the Local Authority, VOSA or Police.
- (o) All 'standard' Babergh District Council Private Hire vehicle conditions of licence (as may be modified from time to time) shall apply to stretched limousine type licensed vehicles unless they are overridden by the special criteria, conditions and licensing requirements relating to stretched vehicles licensed as Private Hire. Proprietors, operators and drivers must ensure that the vehicle is only driven by licensed drivers who have the correct category of entitlement on his/her DVLA issued driving licence.

- (p) The operator and drivers of licensed stretched limousine vehicles shall be subject to all relevant licensing requirements and conditions in force at Babergh District Council (as may be modified from time to time).

It should be noted that these conditions and criteria for licensing shall be kept under periodic review and revised if necessary based on emerging best practice, further guidance and regulatory provisions, and closer working arrangements with neighbouring Licensing Authorities.

Last updated: February 2008

Registered Keeper of vehicle:

Name and address of Registered Keeper of vehicle (as per V5 log book):.....

.....
...

Address where vehicle is to be kept when not in use (this address may require planning permission):

.....
.

Name and address of any other person or company who has an interest in the vehicle. You should include hire purchase, or leasing interests, if applicable:

.....
.....

PART B: Vehicle Details

Please carefully complete the following section about your vehicle. If you supply incorrect details then your licence and plates may not be valid:

Registration number:	Seating capacity (EXCLUDING driver):
Make:	Model:
Body type: Stretched Limousine	Colour:
Stretch conversion length (inches):	Converter: QVM <input type="checkbox"/> / CMC <input type="checkbox"/>
Date of conversion/manufacture:	Imported to UK date:
SVA certificate date:	MOT expiry date:
Engine capacity:	Meter serial number / make (if applicable):
Country of origin:	Date of registration with DVLA:
Date vehicle is 6 years old:	Has the vehicle bench (sideways facing) seating:

Other details for the vehicle [must be completed in ALL cases by the applicant(s)]:

Has the vehicle been modified or altered in any way since SVA inspection?
Is the vehicle to be used <u>solely</u> for weddings and/or funerals?
Do you ensure that the vehicle is regularly and adequately serviced and maintained?
Where do you normally get the vehicle serviced (garage/location)?
Do you ensure that any replacement parts or components required for the vehicle are entirely fit for purpose in terms of specification, manufacture and durability?
Does the vehicle have any CCTV equipment or other security device(s) installed?
Are the vehicle details as specified within the DVLA V5 registration document accurate?
Please give details of any other relevant information concerning the vehicle (for example details of any post-SVA alterations, alterations to DVLA registration, whether the vehicle was imported for 'personal' or 'business' use etc):

Insurance:

Name and address of Insurance Company:

.....
.....

Tel no ☎: e-mail address ✉:

Name and Address of Broker (if applicable):

.....

Tel no ☎: e-mail address ✉:

Policy number: Cover provided:

Date policy expires:

(Note: If you are supplying an insurance cover note with your application you MUST provide the Licensing Section with your full policy document PRIOR to expiry of the cover note).

PART C: Documentation to be provided with application

The following documentation MUST be supplied with the application:

1. FOR NEW VEHICLE LICENCE (where vehicle is additional and not a replacement)

- (a) **Licence fee £385** (includes testing and plates)
- (b) **Vehicle registration document** (V5 log book)
- (c) **Vehicle insurance certificate** (cover notes must be replaced by full document)
- (d) **Indemnification form** completed by your insurance company (form provided)
- (e) **Current MOT certificate**
- (f) **Single Vehicle Approval (SVA) certificate and declaration**
- (g) **Documentary evidence of QVM or CMC programme conversion (to include conversion/manufacture date)**

2. FOR CHANGE OF VEHICLE (replacement for existing vehicle)

A. If you require the expiry date of the licence to remain the same as for the current vehicle :

- (a) **Licence fee £355** (includes testing and plates)
- (b) **Existing private hire licence (and plates)** for currently licensed vehicle

- (c) **Vehicle registration document** (V5 log book)
- (d) **Vehicle insurance certificate** (cover notes must be replaced by full document)
- (e) **Indemnification form** completed by your insurance company (form provided)
- (f) **Current MOT certificate**
- (g) **Single Vehicle Approval (SVA) certificate and declaration**
- (h) **Documentary evidence of QVM or CMC programme conversion (to include conversion/manufacture date)**

B. If you require the licence to run for a full year, you will need to send in £385 for full year's licence and test fee plus all the documents as listed at 2A above.

PART D: Statement by Applicant(s)

I declare that to the best of my knowledge and belief, the statements herein are true and correct. I understand that if for the purposes of obtaining a licence I make any false statement or omit any material particular to the application, I shall be liable to prosecution and any licence granted for the vehicle may be invalidated or immediately suspended/revoked.

In the event of a licence being granted to me, I undertake to fulfill all reasonable obligations to the public and to comply with all the byelaws, conditions, orders, legislation and regulations, at the time being in force.

Signature of Applicant(s): Date:

Signature of Applicant(s): Date:

Signature of Applicant(s): Date:

Last updated: February 2008



**BABERGH DISTRICT COUNCIL
PRIVATE HIRE (STRETCHED LIMOUSINE)
VEHICLE INSPECTION REPORT**

SECTION 1:

Registered owner(s) of vehicle:	
Council receipt number:	BA
Vehicle Registration Number:	
Private hire vehicle plate number (if displayed):	
Maximum number of passengers vehicle is able to carry (note: 'bench' seating will require careful scrutiny and an allowance of 400mm width is considered equal to one person):	PASSENGERS <small>(Vehicles able to seat more than 8 passengers can not be licensed)</small>
Make of vehicle:	
Model/Type:	
Year of conversion/manufacture and converter:	QVM / CMC
Engine Size:	
Are all tyres in a good condition and of adequate type, specification and maximum load bearing ratio/speed rating for the vehicle?:	
Spare tyre available and correct specification:	
Road Tax disc expiry date:	
Are all seats forward facing? If NO please specify seating arrangement:	
Is there any evidence that any spare parts or components have been fitted to the vehicle that are not of adequate specification, manufacture or durability?	
Please give details of any other vehicle modifications:	

SECTION 2:

PLEASE COMPLETE THE FOLLOWING SECTION IN FULL DELETING WHERE APPROPRIATE:

Fuel Type	Petrol / Diesel / LPG ***
Right hand or left hand drive	Right / Left
Tinted windows	Yes / No
Is a tow bar fitted?	Yes / No
Serviceable Fire Extinguisher (x2)	Fitted / Not fitted
If fitted, please state expiry dates:	
Vehicle emission test	Petrol / Diesel / LPG PASS / FAIL

***** PLEASE SPEAK TO BABERGH DISTRICT COUNCIL BEFORE PASSING VEHICLE AS FIT**

SECTION 3:

	Satisfactory	Unsatisfactory
First Aid Kit	<input type="checkbox"/>	<input type="checkbox"/>
Cleanliness - vehicle exterior	<input type="checkbox"/>	<input type="checkbox"/>
Cleanliness - vehicle interior	<input type="checkbox"/>	<input type="checkbox"/>
Floor coverings and upholstery	<input type="checkbox"/>	<input type="checkbox"/>
Seat mounting condition	<input type="checkbox"/>	<input type="checkbox"/>
General interior condition	<input type="checkbox"/>	<input type="checkbox"/>
Fixtures secure (TV, hi-fi, mini-bar etc)	<input type="checkbox"/>	<input type="checkbox"/>
Doors and door locks	<input type="checkbox"/>	<input type="checkbox"/>
Windows and window operation	<input type="checkbox"/>	<input type="checkbox"/>
Window tinting light transmission	<input type="checkbox"/>	<input type="checkbox"/>
	Satisfactory	Unsatisfactory
Mirrors (x 3 - nearside/offside/drivers)	<input type="checkbox"/>	<input type="checkbox"/>
External condition of bodywork	<input type="checkbox"/>	<input type="checkbox"/>
Lighting - interior	<input type="checkbox"/>	<input type="checkbox"/>
Lighting - exterior		
a) side/head	<input type="checkbox"/>	<input type="checkbox"/>
b) rear/number plate	<input type="checkbox"/>	<input type="checkbox"/>
c) fog/brake	<input type="checkbox"/>	<input type="checkbox"/>
d) indicators/hazard	<input type="checkbox"/>	<input type="checkbox"/>
e) beam setting	<input type="checkbox"/>	<input type="checkbox"/>
Seat area - min 400mm per person		
a) Rear	<input type="checkbox"/>	<input type="checkbox"/>
b) Front	<input type="checkbox"/>	<input type="checkbox"/>
c) Side (bench)	<input type="checkbox"/>	<input type="checkbox"/>
Windscreen wipers & washers	<input type="checkbox"/>	<input type="checkbox"/>
Horn operation	<input type="checkbox"/>	<input type="checkbox"/>
Brake performance		
a) Foot	<input type="checkbox"/>	<input type="checkbox"/>
b) Hand	<input type="checkbox"/>	<input type="checkbox"/>
Road wheels	<input type="checkbox"/>	<input type="checkbox"/>
Tyre condition and specification (including load bearing and speed rating)	<input type="checkbox"/>	<input type="checkbox"/>
a) Front	<input type="checkbox"/>	<input type="checkbox"/>
b) Rear	<input type="checkbox"/>	<input type="checkbox"/>
c) Spare		
Steering	<input type="checkbox"/>	<input type="checkbox"/>
Suspension	<input type="checkbox"/>	<input type="checkbox"/>
Wheel bearings	<input type="checkbox"/>	<input type="checkbox"/>
Transmission	<input type="checkbox"/>	<input type="checkbox"/>
Stretch conversion structural integrity	<input type="checkbox"/>	<input type="checkbox"/>
Stretch conversion length (inches)		inches
	Satisfactory	Unsatisfactory
Shock absorbers	<input type="checkbox"/>	<input type="checkbox"/>
Seat belt condition/operation/legality	<input type="checkbox"/>	<input type="checkbox"/>
Exhaust system	<input type="checkbox"/>	<input type="checkbox"/>
Vehicle performance on road test	<input type="checkbox"/>	<input type="checkbox"/>
Last 12 months service and repair history provided for vehicle?	YES	NO

Any adaptations or alterations not listed please speak to BDC first

Additional comments / fault summary :

PLEASE DELETE THE SECTION(S) BELOW THAT DO NOT APPLY:

I CERTIFY THAT THE VEHICLE MEETS THE FULL REQUIREMENTS OF THE REGULATIONS PRESCRIBED UNDER SECTION 45 OF THE ROAD TRAFFIC ACT 1988 (AS AMENDED), AND IS MECHANICALLY FIT TO BE USED FOR THE CARRIAGE OF PASSENGERS FOR HIRE OR REWARD.

OR

THE VEHICLE HAS FAILED AND MUST BE RETURNED FOR RETESTING

OR

THE VEHICLE IS UNROADWORTHY AND MUST NOT BE DRIVEN

Signed: **Date of Examination:** / / 200

Examiner (print name):

Name of Testing Station:

Notes: Please ensure that all Test Examiners are familiar with the Council's licensing criteria and conditions of licence (previously provided to the Testing Station and available upon request). The Council will rely heavily on the expertise of the Test Examiner and the information entered into this test examination report when determining whether to grant a licence for the vehicle.

Please forward completed test examination reports to the Licensing Section, Natural & Built Environment Division, Babergh District Council, Corks Lane, Hadleigh, IPSWICH IP7 6SJ as soon as possible. It is also helpful if test results (including failures) are phoned through to 01473 826658 or 825719 following completion of the vehicle examination.

PROPOSED PRIVATE HIRE VEHICLE (STRETCHED LIMOUSINE) LICENCE FEES:

<u>Standard</u> PHV licence fees for 2008/9	=	£165 licence fee
	=	£ 45 vehicle test (annual)
	=	<u>£ 30 vehicle plates</u>
		£240 total per annum
<u>Stretched limousine</u> PHV licence fees for 2008/9 (Proposed)	=	£225 licence fee
	=	£ 65 vehicle test x 2 (bi-annual)
	=	<u>£ 30 vehicle plates</u>
		£385 total per annum



Guidance for operators of stretch limousines

Table of contents

- [Introduction](#)
- [1. How do I register my Limousine for use on the road in Great Britain?](#)
- [Limousines with up to 8 passenger seats](#)
- [Limousines where the number of passenger seats is around 8-10 but is hard to determine.](#)
- [Limousines with more than 8 passenger seats.](#)
- [2. Can I convert a car that is already registered into a Limousine, by stretching it?](#)
- [Evidence required before undergoing SVA.](#)
- [More information](#)
- [3. Can I use my Limousine to carry fare-paying passengers?](#)
- [Operating hire or reward services without the requisite operator's licence is a criminal offence.](#)
- [4. What type of Operators licence do I need?](#)
- [5. What can I do if my local authority will not license my vehicle as a PHV?](#)
- [6. Are there any exceptions to the requirement to license as a PHV operator?](#)
- [7. Are there any conditions placed on the operators of Small PSVs?](#)
- [8. What is a separate fare?](#)
- [9. Must I always charge separate fares if I operate as a small PSV?](#)
- [10. Can I use the limousine to carry more than 8 passengers?](#)
- [11. What type of service can I operate with a small PSV?](#)
- [12. What is a local service?](#)
- [13. Are excursions and tours local bus services?](#)
- [Appendix 1: VOSA Traffic Area Offices](#)

January 2008

Introduction

This Guidance tries to answer basic questions to assist owners and operators of stretched limousines.

It is only intended for general help; it is not a legal document. For details of the law you will need to refer to the relevant legislation.

Operations for hire, or any sort of payment will require some form of licence, for use either as a public service vehicle or as a private hire vehicle, depending on the type of vehicle and the way it is used. Public service vehicle operators' licences apply across Great Britain and are issued by the Traffic Commissioners. Licences for private hire vehicles are issued by local authorities in England and Wales, but this does not apply in Scotland as the legal framework is different. Section 4 explains which type of licence is needed and where to obtain more information about the licensing requirements.

Further information on specific aspects of the law can be found in the documents listed in this Guidance. If after considering the additional documents you are still unsure about any aspect of the law you may wish to consider seeking independent legal advice.

1. How do I register my Limousine for use on the road in Great Britain?

If you buy a brand new vehicle in Great Britain (GB) the dealer will usually arrange for it to be registered for you. Further information can be obtained from the Direct.Gov website, Motoring section:

<http://www.direct.gov.uk/Motoring/BuyingAndSellingAVehicle/RegisteringAVehicle/fs/en>

A vehicle imported into GB for use on the public road must be licensed and registered immediately after arrival. Information on the procedures for importing, licensing and registering vehicles purchased outside Great Britain can be found on the website above under "Registering an Imported vehicle".

The vast majority of Limousines imported in to GB are exported from the USA. Legislation governing the construction and use of vehicles is significantly different in America and therefore the vehicles will need modifications (significant modifications in the case of larger vehicles) before being compliant with GB requirements.

Limousines with up to 8 passenger seats

Smaller limousines, those with up to 8 passenger seats, will in almost all cases, not be type approved to British or European standards and thus will need to undergo the Single Vehicle Approval (SVA) scheme. The SVA scheme is a pre-registration inspection for cars and light goods vehicles that have not been type-approved to British or European standards. The main purpose of the scheme is to ensure that these vehicles have been designed and constructed to modern safety and environmental standards before they can be used on public roads.

Limousines where the number of passenger seats is around 8-10 but is hard to determine.

The SVA scheme can only be used to approve passenger cars seating up to 8 passengers plus the driver. In some cases it was difficult to determine the exact number of seats because, for example, the vehicle has long bench seats. In those cases, the Vehicle and Operator Services Agency (VOSA) was prepared to

accept a declaration from the applicant for SVA that the seating capacity does not exceed 8 passengers, and that the applicant will undertake to inform any other person that may use the vehicle of that limitation. These vehicles were then registered with a passenger seating capacity of 8. From summer 2008 this will no longer be possible.

Limousines with more than 8 passenger seats.

Larger limousines are not suitable for the SVA scheme. Currently the system for registering large limousines is essentially based on self-declaration that the vehicle is compliant with British laws. The Driver and Vehicle Licensing Agency (DVLA) will accept a COIF (Certificate of Initial Fitness) as confirming that the vehicle complies with GB construction standards, or if a COIF is not available they may request that the vehicle is checked to ensure that it meets GB construction standards. From summer 2008, it is expected that all limousines submitted for registration without a COIF will have to be inspected by VOSA for compliance with GB construction standards before they can be registered with DVLA.

There are very few limousine types that are currently compliant with COIF, which is an inspection carried out by VOSA to check that a vehicle with more than 8 passenger seats complies with GB construction requirements, and is a requirement for a limousine used for carrying paying passengers.

The Department is aware that vehicles not complying with GB construction regulations have been registered and is taking steps to prevent this. For most of these vehicles it will be expensive to convert them so that they comply.

2. Can I convert a car that is already registered into a Limousine, by stretching it?

It is possible to take a car which is already registered with DVLA and convert it into a Limousine, using reputable coachbuilders here or in the USA. Once the vehicle has been converted you are legally required to notify DVLA of the changes, since the identity of the vehicle may be brought into question. It is possible that the passenger capacity or the taxation class of the vehicle would have changed, so the V5 registration document would no longer be valid. A future buyer of the vehicle will be suspicious if the vehicle in front of him/her is not as described on the V5.

If a vehicle or its chassis has been cut in half and extended, the vehicle would need to be inspected by DVLA and would be assessed as being in one of two categories, either as radically altered from its original specification, or, if a kit of new parts has been used in the build, as a kit conversion. The registration number will change because this is not the same vehicle as that described on the vehicle records and it would be misleading to retain the original registration number when the vehicle has undergone such major modifications.

DVLA issues a guide to the registration of rebuilt, radically altered and kit converted vehicles, in the form of an information leaflet INF 26, which is available from DVLA Local Offices. Information is also available on www.direct.gov.uk. You will be required to show receipts, build plans and photographs of the build if you are applying for kit conversion status.

DVLA advises that before modifying a vehicle which has a cherished registration mark, the vehicle keeper may wish to consider securing the mark, which may be lost if the vehicle's identity is changed.

If, following modification, the identity of the vehicle is changed then evidence of type approval will be required in order to register the vehicle. This will normally be SVA. However, if the number of passenger seats now exceeds 8 then the vehicle is not normally subject to SVA, but should be submitted to VOSA for "COIF" (Certificate of Initial Fitness) certification if it is to be used for hire and reward, as most limousines are.

Evidence required before undergoing SVA.

Before a converter submits his vehicle to VOSA for SVA inspection, he will have to provide evidence to demonstrate the modified vehicle's capability to operate at weights higher than the original vehicle's maximum gross weight, if this will be exceeded when the vehicle is full of passengers. Key components such as the axles, suspension and brakes may have to be upgraded to take the extra weight of the converted vehicle, compared to the original base vehicle.

More information

For further information on registering a rebuilt, radically altered or kit converted vehicle, see the following link on the Direct.gov website:

http://www.direct.gov.uk/Motoring/BuyingAndSellingAVehicle/RegisteringAVehicle/RegisteringAVehicleArticles/fs/en?CONTENT_ID=10014246&chk=VsQ/Fs

3. Can I use my Limousine to carry fare-paying passengers?

Theoretically yes, but you will need some form of operator's licence.

Virtually any motor vehicle used in Great Britain to carry passengers for hire / hire or reward on a commercial basis needs a licence of some kind. The type of licence required depends upon on the capacity of the vehicle and the type of operation undertaken.

Operating hire or reward services without the requisite operator's licence is a criminal offence.

Hire or reward is any sort of payment which gives a person a right to be carried on a vehicle regardless of whether a profit is made or not. The payment may be made by the person himself, or on his behalf. It may be a direct payment (such as a fare, hire charge or other payment made directly in respect of the journey) or an indirect payment (such as a membership subscription to a club, payment for a bed in a hotel or payment for concert tickets).

4. What type of Operators licence do I need?

For vehicles constructed or adapted to carry more than 8 passengers, the licence required is a public service vehicle (PSV) operator's licence issued by the Traffic Commissioner.

For vehicles adapted to carry 8 passengers or fewer, it is either:

(a) a private hire vehicle (PHV) licence if the vehicle is hired out, with a driver, as a whole (ie: an exclusive hiring). In England and Wales these licences are administered by the relevant local authority or Transport for London (TfL) who have discretion as to what vehicles they will license. The situation is similar in Scotland with the Scottish Executive having legislative responsibility.

(b) a PSV operator's licence if the vehicle is used for carrying passengers at separate fares in the course of a business of carrying passengers, once again issued by the Traffic Commissioner. This type of operation is known as a small PSV.

Information on the PSV operator licensing regime is contained in the guidance booklet PSV437 which can be obtained from any of VOSA's traffic area offices (for address and contact details see appendix 1) or can be accessed on the VOSA website (www.vosa.gov.uk).

In England and Wales, information on the local private hire vehicle requirements can be obtained from your local licensing authority (district/borough councils, unitary authorities or TfL). Given that most operations are likely to be exclusive hirings the vast majority of Limousine operations will fall within the requirements of the PHV operator regime.

If you need further information about the operation in Scotland of small passenger-carrying vehicles (with 8 or fewer passenger seats) ask the Scottish Traffic Area for a copy of the note 'Licensing of Small Passenger Carrying Vehicles'.

You will also need to ensure that you have the appropriate vehicle and operator insurance for your operation. Operating without valid vehicle insurance could result in your vehicle being impounded.

5. What can I do if my local authority will not license my vehicle as a PHV?

Each local licensing authority in England and Wales may decide which vehicles are suitable for licensing as PHVs in their area. Accordingly, it is for each licensing authority to decide for its area whether they wish to license stretched limousines as PHVs, taking into account local circumstances. It is important to note that vehicles can only be licensed as PHVs if they have fewer than 9 passenger seats.

The Department for Transport has issued best practice guidance to local licensing authorities in England and Wales on the licensing of taxis and PHVs. That guidance encourages local authorities to consider the licensing of limousines on a case by case basis and not to impose a blanket ban on the type of vehicle.

The licensing process allows for would-be licence holders, who are refused a licence on the grounds that a vehicle is unsuitable to be licensed as a PHV, to appeal against the authority's decision in the local magistrates' court.

6. Are there any exceptions to the requirement to license as a PHV operator?

If vehicles with up to 8 passenger seats, including stretched limousines, are used solely for weddings and/or funerals, they are exempt from PHV licensing requirements.

7. Are there any conditions placed on the operators of Small PSVs?

When granting an application for a Small PSV licence to the operator of a stretch limousine the Traffic Commissioner may attach a standard set of conditions to the licence. The conditions generally imposed for limousine operators are:

- When using a stretch limousine under a PSV licence the vehicle will not carry more than 8 passengers.
- Passengers must be carried at separate fares (see below).
- If any journey is less than 15 miles measured in a straight line, then it must be registered as a local service with the Traffic Commissioner prior to its operation.
- The registration numbers of all vehicles which are used under the PSV operator's licence are to be logged with the Traffic Commissioner within seven days of their acquisition. If a vehicle is no longer used under the PSV licence that fact must also be notified to the Traffic Commissioner within seven days of its cessation.
- Before being used under a PSV licence stretch limousines must pass a Single Vehicle Approval test and hold a relevant annual test certificate.

8. What is a separate fare?

If a limousine is licensed as a small PSV, (carrying 8 or less passengers), **separate fares** must be charged. The term "separate fares" is not defined in legislation. However, we believe it represents a charge made directly or indirectly to each passenger for carriage which is unaffected by the number of fare payers. This is the way fares are often structured, for example, on a local bus service. Subject to any concessions that the operator may give, each passenger pays the same fare for the same journey, regardless of how many other passengers on the bus wish to make that journey.

9. Must I always charge separate fares if I operate as a small PSV?

In most cases the answer is yes, otherwise you will be operating as a PHV and will need to be licensed accordingly.

There is one exception to the requirement for separate fares to be charged. "Big bus" operators (ie those operating vehicles with 9 or more passenger seats) can run small PSVs for some private hire work, provided the operation of these vehicles represents a small part of their overall business. What constitutes

âa small partâ is also not defined in legislation, and ultimately, final decisions on where the balance lies is a matter for the courts. The legislation confers the exemption on an operator whose use of small vehicles is only a small part of his business.

The *relative size* of the fleet of large and small buses is obviously very relevant and as a *rule of thumb* we believe that if less than 10% of the overall fleet licensed under a single PSV Operatorâs Licence are small vehicles the exemption will apply (e.g. a fleet of, say, 20 buses with 9 or more passenger seats could run 2 additional vehicles - which could be stretched limousines that carry 8 or less passengers - for private hire work). But because the legislation refers to the size of the small and large bus business other factors (such as mileage run) should be taken into account. We would hope that in most cases it would be obvious what was and what was not, to coin a phrase, a âlarge bus businessâ.

You will need to make the Traffic Commissioner aware if you are a big bus operator wishing to run stretch limousines, so that the standard conditions attached to the PSV licence can be reconsidered.

10. Can I use the limousine to carry more than 8 passengers?

Only if you have a PSV operator licence that allows for that. In order to obtain such a licence you will need to prove that your vehicle complies with legally required safety standards. In order to prove this, your vehicle will need to have a Certificate of Initial Fitness (COIF) issued by VOSA.

However, most limousines imported from the USA cannot obtain such a certificate because they do not comply with GB construction and use regulations. In particular, the regulations require any passenger vehicle carrying more than eight people to have exits big enough to get passengers out quickly in the event of an emergency. Many limousines do not comply with this requirement. In addition, the regulations require European-approved lamps, mirrors, tyres, seat belts and glass, which are not present on American vehicles, and the regulations on turning circle are not met by most stretched American vehicles.

If your vehicle is able to comply with the safety standards, guidance on obtaining a PSV licence is available in the booklet PSV 437. The guidance provides details of the type of services that you may provide using such a licence but you will also need to consider the impact of the drivers' hours and driver licensing requirements for PSV vehicles. Guidance on drivers hours is available in the document PSV 375 (also available from VOSA) and driver licence information is available from DVLA (www.dvla.gov.uk or tel: 0870 240 0009).

11. What type of service can I operate with a small PSV?

You can operate either a local service (standard or flexibly routed) or operate excursions and tours.

Note: you cannot do any work which needs a PHV licence without the required licence.

Also, there are restrictions on the carriage of alcohol on vehicles used to take passengers to certain sporting events.

Further information on the operation of PSV vehicles can be found in the guidance document PSV 437 and information on local services can be found in PSV353A (local service registrations) and PSV358A (flexible local bus service registrations) from either the Traffic Area Offices or via the VOSA website.

12. What is a local service?

It is a bus service using Public Service Vehicles (PSVs) to carry passengers at separate fares over short distances. The route can be of any overall length, as long as throughout

its length passengers can get off within 24.15 kms (15 miles) (measured in a straight line) of the place where they were picked up. Local services must be registered with the Traffic Commissioner.

The legislation specifying what service particulars must be registered with the Traffic Commissioner for a local service imposes different requirements according to whether the service in question is a 'standard service' (ie a conventional registered local service) or a 'flexible service'. Further information on the description and operation of local services are contained in the guidance notes mentioned in the previous section.

13. Are excursions and tours local bus services?

On an excursion or tour all the passengers must travel together to the same place or places and then return together to the place where they got on. (They need not get on at exactly the same place.)

Excursions and tours only need to be registered with the traffic commissioner as a local service if all three of the following points are met:

- separate fares are paid;
- the whole journey is within a 15 mile radius of the starting point;
- they run one or more times a week for at least 6 weeks in a row.

It is accepted that most limousine operators running a small PSV taking ad hoc bookings will not need to register all of their likely journeys as local services because of the final point above. However, if you are not sure how long or how often the service will run you should register it to be on the safe side.

Any excursion or tour which is a local bus service and has a stop in London must also have a London service permit. Again you should contact Transport for London for details.

Appendix 1: VOSA Traffic Area Offices

All correspondence should be addressed to the Clerk to the Traffic Commissioner

<p>North Eastern</p> <p>Hillcrest House 386 Harehills Lane Leeds LS9 6NF</p> <p>Telephone: 0870 606 0440 Fax: 0113 249 8142</p>	<p>North Western</p> <p>Hillcrest House 386 Harehills Lane Leeds LS9 6NF</p> <p>Telephone: 0870 606 0440 Fax: 0113 249 8142</p>
<p>West Midland</p> <p>38 George Road, Edgbaston, Birmingham B15 1PL</p> <p>Telephone: 0870 606 0440 Fax: 0121 456 4250 (Lic) 0121 456 3513 (Comp)</p>	<p>Eastern</p> <p>City House 126-130 Hills Road Cambridge CB2 1NP</p> <p>Telephone: 0870 606 0440 Fax: 01223 309 684 (Lic) 01223 309 681 (Comp)</p>
<p>Western</p> <p>2 Rivergate Temple Quay Bristol BS1 6EH</p> <p>Telephone: 0870 606 0440 Fax: 0117 929 8352</p>	<p>South Eastern and Metropolitan</p> <p>Ivy House 3 Ivy Terrace Eastbourne BN21 4QT</p> <p>Telephone: 0870 606 0440 Fax: 01323 726 679</p>
<p>Scottish</p> <p>J Floor Argyle House 3 Lady Lawson Street Edinburgh EH3 9SE</p> <p>Telephone: 0870 606 0440 Fax: 0131 229 0682</p>	<p>Welsh</p> <p>38 George Road, Edgbaston, Birmingham B15 1PL</p> <p>Telephone: 0870 606 0440 Fax: 0121 456 4250 (Lic) 0121 456 3513 (Comp)</p>