

# LICENSED HORSE DRAWN HACKNEY CARRIAGES SCRUTINY REVIEW FINAL REPORT

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#### 1.0 Foreword

- 1.1 The Tourism, Economy and Resources Scrutiny Committee initiated the review following a referral from the Public Protection Sub-Committee. The referral had been made following an increase in the number of complaints received throughout 2014 relating to the service and following a serious incident that had occurred in October 2014. A previous scrutiny review of the service had been undertaken in 2007, but the layout of the promenade had changed significantly since then. Therefore, it was thought appropriate for the issue to be considered in detail once more.
- 1.2 Following an initial meeting of the Panel to establish a Chairman for the review and to agree the scope for the review, an 'in a day' review approach was utilised. This meant that the Panel only held one meeting to which all key officers and representatives of the service were invited. All evidence was considered before the Panel came to its conclusions and recommendations. I feel that this approach worked well for this particular review.
- 1.3 As part of the review, the Panel invited contributions from the Head of Licensing Services, the Licensing and Health and Safety Manager, the Streetscene Manager and Highways and Traffic Management Services. Contributions were also invited from representatives of the licensed horse drawn hackney carriage trade, the RSPCA, Mr Fielding (Veterinary Surgeon), the Police and the current horse drawn carriage driving examiner.
- 1.4 I would like to thank everyone who contributed to the review and gave their time willingly. I freely acknowledge the help and assistance given to me by the other Councillors on the Panel and the officers from across Blackpool Council.

Councillor Hunter
Chairman, Licensed Horse Drawn Hackney Carriages Scrutiny Review Panel

## 2.0 Summary of Recommendations

	Timescale
Recommendation 1  A full health and safety risk assessment be undertaken considering Licensed Horse Drawn Hackney Carriage operations on the Promenade, which would specifically include the considerations of operations on a Friday evening.	TBC
Recommendation 2  The Head of Licensing Services to investigate that the insurance cover required of Licensed Horse Drawn Hackney Carriage Operators is suitable and fit for purpose and if it is found to not be fit for purpose the matter to be brought to the attention of the Tourism, Economy and Resources Scrutiny Committee for its consideration.	Committee Members to be advised by 3 March 2016 if not suitable.
Recommendation 3  The Head of Licensing Services to investigate establishing a more stringent and rigorous driving test for horse drawn carriage operators. The new test should include:  a) A theory test element b) Part of the test to be conducted off the public highway to examine drivers' control of the carriage and ability to perform manoeuvres, as well as testing on animal husbandry and attaching the dung catching device. c) An increased amount of test time on the promenade d) Following completion of the above elements of the new test, the Horse Drawn Carriage Operator should be given a 'provisional licence'. A full licence would then only be given following the completion of an appropriate number of supervised hours with an experienced Licensed Horse Drawn Hackney Carriage Operator. It was suggested that 100 hours may be considered appropriate.	Changes to be brought in by the revised horse drawn hackney carriage policy – see below for timescale
Recommendation 4 A comprehensive review of the Licensed Horse Drawn Hackney Carriage Policy and Fare structure be undertaken by the Head of Licensing Service. a) This review to be undertaken in conjunction with the Highways and Traffic Management Services and representatives of Licensed Horse Drawn Hackney Carriage Operators, in order to consider where it would be appropriate to prohibit U-turns on the promenade.	Licensing Committee to consider the revised draft policy on 1 March 2016  Executive to consider following full consultation on 18 July 2016
Recommendation 5 The Head of Licensing Services to investigate the cost and feasibility of ring-fencing part of the licence fee for clean-up operations, with a view to allocating appropriate resources to reduce horse waste on the promenade in busy periods.	31 March 2016

Recommendation 6 The Head of Licensing Services to investigate the possibility of having different, separate stands for horse drawn carriages and motorised licensed hackney carriage vehicles and dedicated change over areas away from the promenade.	30 June 2016
Recommendation 7  A dedicated Forum for Licensing Services and Licensed Horse Drawn Hackney Carriage Operators be established to meet three times per year. It was suggested those times be at the start, once during and after the main tourist season and that Licensing Services would administer that Forum.	First meeting to take place on or before 1 March 2016

#### 3.0 Background Information

- 3.1 At the Scrutiny Committee on 9 July 2015, Members of the Tourism, Economy and Resources Scrutiny Committee agreed to establish an 'in a day' review of Licensed Horse Drawn Hackney Carriages in Blackpool.
- 3.2 The review topic was chosen following a referral from the Public Protection Sub-Committee requesting a review of the Council's policy on licensed horse drawn hackney carriages, following an increase in the number of complaints about the service throughout 2014. The complaints related to the amount of horse manure on the promenade, carriage drivers driving unsafely down the middle of the road and carriages driving through red lights. There had also been an increase in the number of queries concerning the welfare of the horses whilst on the Promenade. In addition, in October 2014 a serious incident had taken place that had involved a horse being startled and subsequently bolting down the promenade. The carriage in question collided with members of the public on the promenade and a six year old boy had his collar bone broken as a result.
- 3.3 A previous scrutiny review of the landau service had been undertaken in 2007. Since then, the layout of the Promenade has changed significantly and, in light of the above mentioned increase in complaints, it was therefore considered appropriate for the issue to be considered in detail once more.
- 3.4 The Scrutiny Review Panel comprised of Councillors Hunter (Chairman), Mrs Callow, Mrs Henderson, Hutton and O'Hara.
- 3.5 A large amount of preparatory work was undertaken to identify the following key areas for consideration in the review:
  - Data relating to the frequency and types of complaints;
  - Information relating to the serious incident in October 2014;
  - Road safety concerns in light of the new promenade layout;
  - The welfare of horses in light of the new promenade layout;
  - The beneficial impact the service has upon tourism in Blackpool;
- 3.6 This review related to the following priorities of the Council:
  - Expanding and Promoting our tourism, arts, heritage and cultural offer
  - Encouraging responsible entrepreneurship for the benefit of our communities

## 4.0 Methodology

4.1 The Panel adopted an 'in a day' approach for the review and held one meeting to consider all evidence and speak to witnesses. This meeting followed an initial scoping meeting. Details of the meetings are as follows:

Date	Attendees	Purpose
25 August 2015	Councillors Hunter (Chairman), Mrs Callow, Mrs Henderson MBE, Hutton and O'Hara.  Chris Kelly, Senior Democratic Services Adviser	To elect a Chairman and agree the scope for the review.
14 October 2015	Councillors Hunter (Chairman), Mrs Callow, Hutton and O'Hara.  Sharon Davies, Head of Licensing Services Mark Marshall, Licensing/Health and Safety Enforcement Manager Sean Powell, Senior Technician (Traffic Management) Jez Evans, Streetscene Manager Chris Kelly, Senior Democratic Services Adviser (All Blackpool Council)  Alison Metcalfe, Landau Association Julie Brown, Cinderella Carriage Owner Carolyn Edwards, Landau driver Catherine Johnson, Landau driver	To consider information relating to complaints, the existing Licensed Horse Drawn Hackney Carriage Policy, Highways safety issues, information relating to clean-up operations and environmental impact of the Licensed Horse Drawn Hackney Carriage Service and to discuss those issues with officers and representatives from the Licensed Horse Drawn Hackney Carriage Service.

#### 5.0 Detailed Findings and Recommendations

#### 5.1 Serious incident – 28 October 2014

- 5.1.1 Members considered a serious incident which had taken place on 28 October 2014. The details of the incident involved a couple and three young children commencing a journey in a carriage. The carriage driver was one of the more experienced drivers currently licensed. The horse at the time had been working on the Promenade for 14 years.
- 5.1.2 The carriage had been heading northbound by the Foxhall pub. The carriage driver indicated that traffic had been backed up and he was in the outside lane. As he passed a bus, the horse started to jump then accelerated along the road. It is thought that the horse had been 'spooked' by the hissing sounds of a buses' brakes. Despite the best efforts of the carriage operator, the horse became out of control galloping north in the middle of the road. The horse slowed down slightly by Chapel Street but not enough for the carriage operator to regain control. As they approached the rank outside Mr T's, the carriage operator attempted to slow the horse by gradually doing a U-turn. Unfortunately in doing this, the carriage hit the kerb and the carriage operator fell off.
- 5.1.3 The carriage continued on without the carriage operator and reports indicated that both the horse and carriage went onto the pavement in the area around the Sea-Life Centre, running into a family who were walking north. The mother was hit in the face and knocked onto the floor, a pram containing a baby was flipped over and their six year old son was knocked onto the floor at 90degrees to the shops. A wheel of the carriage ran over the young boy in the area of his upper chest causing a broken collar bone. The mother sustained cuts and severe bruising and the baby who had been strapped into the pram suffered only cosmetic injuries. The carriage continued along the promenade, followed by the carriage driver who had by then made chase in a taxi. The carriage finally came to a stop by the Kensington Hotel. The people in the carriage fortunately had no physical injuries, although it was a terrifying experience for them.
- 5.1.4 Members raised serious concerns over the incident and noted that it could have ended with a fatality. The Panel considered that a full health and safety risk assessment of horse drawn carriage operations on the promenade should be undertaken.
- 5.1.5 Members also considered the busiest times for traffic on the promenade and noted that horse drawn carriages were not restricted from plying for trade on Saturday evenings during the illuminations from 15 minutes before they were switched on until 15 minutes after they had been switched off. The Panel noted that over the course of the tourist season, there were a number of Friday evenings that would be expected to be as busy as Saturday evenings, such as events including the 'Switch On' and firework displays. It was therefore considered that the safety of operating carriages on those busy Friday evenings should be fully assessed.

#### **Recommendation One**

A full health and safety risk assessment be undertaken considering Licensed Horse Drawn Hackney Carriage operations on the Promenade, which would specifically include the considerations of operations on a Friday evening.

- 5.1.6 Members also discussed the position with regards to insurance and it was reported that Licensed Horse Drawn Hackney Carriage Operators, as a term of their licence, were required to have insurance. However, the Panel was advised that the circumstances for liability were defined by the Animals Act 1971 and that a carriage operator would only be responsible and therefore, insured for instances that were reasonably foreseeable. The Panel raised concerns that there could be a potential for an accident to occur that was not considered reasonably foreseeable, therefore the carriage operator's insurance would not cover liability for the incident.
- 5.1.7 The Panel considered that the issue needed to be explored further to ensure that carriage operator' insurance cover was suitably comprehensive.

#### **Recommendation Two**

The Head of Licensing Services to investigate that the insurance cover required of Licensed Horse Drawn Hackney Carriage Operators is suitable and fit for purpose and if it is found to not be fit for purpose the matter to be brought to the attention of the Tourism, Economy and Resources Scrutiny Committee for its consideration.

#### 5.2 Standard of Driving

- 5.2.1 The Panel was advised that a number of complaints had been received regarding horse drawn carriages being driven through red traffic lights. It was noted that the criminal offence of going through a red light may only apply to motorised vehicles, however the practice of ignoring the signs could place passengers in the carriage or drivers of other vehicles on the road in danger. Details were provided to the Panel of carriage operators being observed driving through red lights by enforcement officers. Those carriage operators were subsequently dealt with by the Public Protection Sub-Committee. Representatives of the horse drawn carriage operators, whilst noting that it was more difficult for horse drawn carriages to stop as quickly as a motorised vehicle could for traffic lights, did agree that instances such as those detailed did occur and there was a requirement for some drivers to be better trained.
- 5.2.2 Further complaints had been received relating to carriages being driven down the centre of the road. It was noted that it was not an offence for the carriages to overtake and drive down the centre of the promenade, but that it became a problem when it was unsafe to do so. The Panel was provided with examples of complaints from members of the public and it was noted that this type of behaviour had also been observed by officers. At peak times when the promenade was busy with motorised vehicles, horse drawn carriages often performed overtaking manoeuvres that resulted in them driving down the centre of the road, rather than travelling at the same speed as the cars. It was

noted that issue had become more prevalent since the changes to the promenade resulted in the road becoming narrower than it once was. It was also considered by representatives of the horse drawn carriage operators that recently there were more parked cars along the promenade, with many belonging to traders, which exacerbated the situation. However, it was considered that there was still an issue with carriage operators not always being suitably experienced and not driving to an acceptable standard.

- 5.2.3 The Panel noted that Licensed Horse Drawn Hackney Carriage drivers were required to pass a driving test before being granted their licence. Members considered information that had been provided relating to the content of the current driving test.
- 5.2.4 The Panel considered that a more stringent driving test would help to improve the competency of Licensed Horse Drawn Hackney Carriage drivers. Members discussed with officers and representatives of the Licensed Horse Drawn Hackney Carriage service, potential new elements to the test, which they considered appropriate and would help to improve standards.

#### **Recommendation Three**

The Head of Licensing Services to investigate establishing a more stringent and rigorous driving test for horse drawn carriage operators. The new test should include:

- a) A theory test element
- b) Part of the test to be conducted off the public highway to examine drivers' control of the carriage and ability to perform manoeuvres, as well as testing on animal husbandry and attaching the dung catching device.
- c) An increased amount of test time on the promenade
- d) Following completion of the above elements of the new test, the Horse Drawn Carriage Operator should be given a 'provisional licence'. A full licence would then only be given following the completion of an appropriate number of supervised hours with an experienced Licensed Horse Drawn Hackney Carriage Operator. It was suggested that 100 hours may be considered appropriate.
- 5.2.5 The Panel was advised that Highways and Traffic Management Services shared Members' concerns regarding the potential for collisions in times of increased traffic on the promenade. It was also noted that Highways and Traffic Management did not specifically document complaints regarding Licenced Horse Drawn Hackney Carriages, but that officers within the department were aware of issues relating to carriage drivers driving through red lights, driving down the centre of the carriage way and finding it hard to distinguish between the highway / footpath in some places on the promenade.
- 5.2.6 It was explained to the Panel that a particular problem and cause of complaints relating to horse drawn hackney carriages, were instances of carriages performing U-turns on the promenade in busy traffic. It was considered that those types of incident had a particularly high potential risk of accident.
- 5.2.7 The Panel discussed the routes used by carriage operators and it was noted that, whilst the current policy enabled operators to pick up and drop off anywhere along the promenade, most operators had developed set routes from which they operated.

- Members noted that those routes were often linked to the fare charged by the operators. Members considered that the current fare structure was complicated and potentially confusing for customers.
- 5.2.8 It was considered by the Panel that it would be appropriate for officers to undertake a comprehensive review of the Licensed Horse Drawn Hackney Carriage Policy and Fare structure. This review would include an examination of the routes used by carriage operators with a view to designing safer, fixed routes and pick up areas. The review would also investigate the locations where it was particularly dangerous to perform a Uturn, with a view to prohibiting U-turns on the promenade in those areas. It was considered that a revised policy would need to be suitably enforced.

#### **Recommendation Four**

A comprehensive review of the Licensed Horse Drawn Hackney Carriage Policy and Fare structure be undertaken by the Head of Licensing Service.

a) This review to be undertaken in conjunction with the Highways and Traffic Management Services and representatives of Licensed Horse Drawn Hackney Carriage Operators, in order to consider where it would be appropriate to prohibit U-turns on the promenade.

#### 5.3 Horse Manure on the Promenade

- 5.3.1 The Panel noted that there had recently been an increase in enquires and complaints from both elected Members and members of the public in relation to the amount of horse manure left on the road. This could in part be explained by the fact that 2014 had seen an extended period of good weather and an increased number of visitors. This resulted in a higher number of horse drawn carriages operating on the promenade.
- 5.3.2 Members were informed that the dung catching devices were held in place by an elastic bungee fastener that allowed the device to move backwards along the shafts of the carriage and away from the rear of the horse. However, if not checked regularly or fitted properly, the device could end up too far away from the rear of the horse to be effective. It was considered that if carriage operators did not check the fasteners after each journey, the effectiveness of the device was reduced. It should be noted that the devices would never be 100% effective, even if they were fitted correctly and checked after every journey.
- 5.3.3 It was noted that officers had been monitoring the situation when possible, checking the carriages when stationary on the stands and reminding drivers of their responsibility to ensure that the dung catching devices were fixed in the correct position to catch the maximum amount of manure. The Panel considered that the competency of drivers in regards to attaching the nappy slings and the importance of doing so, should be covered on the revised driving test that the Panel had recommended be implemented.
- 5.3.4 Members were advised by the Streetscene Manager that in his opinion, there had been general improvements over the years in regards to the operators acting responsibly and cleaning the ranks as and when required and that carriages appeared to be carrying a hand shovel and bucket.

- 5.3.5 The Panel noted the service offered a daily collection of four designated horse manure drop off bins, which were located at the main 'ranks':
  - South Promenade West Side opposite Sandcastle
  - Central Promenade West Side opposite Central Pier
  - Central Promenade East Side opposite Madame Tussauds
  - Central Promenade East side opposite Sea Life Centre

The bins were serviced daily as part of routine litter bin servicing and no charges for collection or disposal of waste applied. It was reported that the facilities were well used by the operators.

- 5.3.6 Members were advised that the impact of horse drawn carriage operations on the street cleansing service was minimal in relation to specific operational cleaning. It was noted that the promenade carriageway was mechanically swept early every morning, with any loose horse fouling being removed as part of the daily cleaning routine. Any fouling present after that would likely remain on the promenade until the next routine morning cleanse. This had a detrimental impact on the cleansing standards and was difficult to overcome with traffic congestion and current financial resources resulting in it not being able to be removed more frequently.
- 5.3.7 The Panel was advised that the drainage from rain water gullies on Central Promenade discharged to Manchester Square pumping station and were released to the sea at high tide. There had not been any DNA readings of water quality from the Environment Agency since 2012 so it was difficult to assess the exact impact and formalise evidence since that date, however equine bacteria had been present at that last test. It was noted that donkeys also operated on the beaches, but that part of their licence to operate included for the removal of all donkey fouling daily from each individual 'pitch'. It was considered reasonable to assume that any equine pollution would affect sea water quality and would be discharged directly to the sea. The result would be to make compliance with the more stringent bathing water quality standards increasingly difficult.
- 5.3.8 Members also took into account that other horses used the promenade and nearby streets. It was noted that horses pulling small traps could frequently be seen on the Promenade. Those traps were often used to train potential horses to pull licensed carriages, or to deliver a new horse to a carriage that was already working (one horse should only work for a maximum of seven hours a day). The promenade was also used by other horses, for example Police horses. Neither the horses pulling traps nor the Police horses were licensed by the Authority therefore they were not required to wear a manure catching device. However, they would undoubtedly contribute to the horse manure problem.
- 5.3.9 The Panel considered a proposal to ring-fence part of the carriage operators' licence fee for clean-up operations, with a view to allocating appropriate resources to reduce horse waste on the promenade in busy periods. It was agreed that officers should first investigate the cost and feasibility of implementing this.

#### **Recommendation Five**

The Head of Licensing Services to investigate the cost and feasibility of ring-fencing part of the licence fee for clean-up operations, with a view to allocating appropriate resources to reduce horse waste on the promenade in busy periods.

- 5.3.10 The Panel questioned from which areas of the promenade most complaints regarding horse manure arose from and it was reported that the particularly problematic areas were around the Tower and by the Comedy Carpet, which were areas of raised highway.
- 5.3.11 Members were provided with further information relating to the queuing at rank. It was noted that traditionally, licensed horse drawn carriage operators had established a 'first turn' rule. The rule involved the carriage at the front of the rank taking the next customer and the carriage operator behind clearing any horse manure before left moving forward along the rank. The Panel was advised that since Cinderella carriages had been introduced, commercial practices had evolved as customers now had a choice between those or traditional landaus. This had been to the detriment of the rule being sufficiently applied and had resulted in there being an increase in the amount of manure left at the ranks. The issue could be exacerbated by horse drawn carriages also sharing ranks with motorised hackney carriages.
- 5.3.12 It was considered that certain ranks could also become overloaded at times. This not only increased the chances of horse manure being left on the road, it could also increase the potential for traffic issues as a result of the ranks being too full and carriages not being parked safely at the back of the rank. The Panel agreed that officers should investigate the possibility of having separate stands for horse drawn carriages and motorised licensed hackney carriage vehicles and for those horse drawn carriage stands to not be located in those areas that traditionally suffered problems with horse manure.
- 5.3.13 Members were also advised that there could frequently be problems with horse manure at times when the horses for the carriages were changed over. It was noted that the change overs were currently undertaken at almost any site along the promenade, which often included on pedestrianised areas. The Panel considered that an investigation should be undertaken by officers to try to identify if having a dedicated change over area, near to but not actually on the promenade, would be more appropriate and if so, where those change over areas would be best located.

#### **Recommendation Six**

The Head of Licensing Services to investigate the possibility of having different, separate stands for horse drawn carriages and motorised licensed hackney carriage vehicles and dedicated change over areas away from the promenade.

#### 5.4 Animal Welfare

5.4.1 Members noted that over the last year a number of members of the public had contacted the Council with concerns about the welfare of the horses whilst they were on the Promenade. The issues raised had frequently covered access to water and shelter.

- 5.4.2 The Panel noted that the RSPCA had been contacted and it did not oppose the use of horse drawn carriages, however it strongly maintained that all horses used for this purpose should have their welfare ensured.
- 5.4.3 Members also considered a representation relating to horse welfare from a veterinary surgeon that had experience of working in Blackpool with horses used for licensed horse drawn hackney carriages. It was noted that he did not consider there to be any valid reason that the animals could not work safely and effectively in their present locations, provided that they were of an adequate type in terms of breed, physical condition and general health. He also considered that the provision of adequate water and, if required, foodstuffs during the work period must be assured for the animals. Under normal circumstances major provision of shelter during the work period would not be essential, but areas of temporary respite for rest periods should be present and appropriately sited.
- 5.4.4 It was considered by the Panel following discussions regarding animal welfare that the horses were well looked after and fed and watered appropriately. Representatives of the horse drawn carriage operators explained the steps they took to ensure the welfare of their animals and it was noted that the carriage operators had an interest in ensuring the welfare of the animals as their livelihood depended on it. It was also noted that the existing policy required that no horse should be used in connection with licensed vehicles unless within the preceding twelve months, a veterinary surgeon had examined the horse and issued a certificate of fitness in a form approved by the Council.
- 5.4.5 Arising from the Panel's discussions with representatives of the licensed horse drawn hackney operators, it became apparent that there was a need to resolve a maintenance issue with the water tap for horses at South Shore. Resolving this would help to ensure the animals had adequate supply to a drink.

#### 5.5 Improved communication

5.5.1 It was considered by the Panel and by representatives of the licensed horse drawn hackney carriage trade that problems and complaints could be resolved more easily in future by increasing and improving the level of dialogue between representatives of the trade and the licensing authority. The Panel agreed that a dedicated forum meeting at timely intervals throughout the main tourism season should be established in order to achieve this.

#### **Recommendation Seven**

A dedicated Forum for Licensing Services and Licensed Horse Drawn Hackney Carriage Operators be established to meet three times per year. It was suggested those times be at the start, once during and after the main tourist season and that Licensing Services would administer that Forum.

### 6.0 Financial and Legal Considerations

- 6.1 Financial
- 6.1.1 There are no financial implications.
- 6.2 Legal
- 6.2.1 Implementing recommendations 2, 3 and 4 would require amendments to the horse drawn hackney carriage policy. Any changes to this policy would require consultation with the trade.
- 6.2.2 Restricting carriages on Friday evenings (recommendation 1) and preventing U turns on the promenade (recommendation 4) could only be achieved through appropriate road traffic orders.
- 6.2.3 The legality of creating separate mechanised and horse drawn ranks would need to be explored.

## **Licensed Horse Drawn Hackney Carriages Scrutiny Action Plan**

Recommendation	Cabinet Member's Comments	Rec Accepted by Executive?	Target Date for Action	Lead Officer	Committee Update	Notes
Recommendation One						
A full health and safety risk assessment be undertaken considering Licensed Horse Drawn Hackney Carriage operations on the Promenade, which would specifically include the considerations of operations on a Friday evening.  Recommendation Two						
The Head of Licensing Services to investigate that the insurance cover required of Licensed Horse Drawn Hackney Carriage Operators is suitable and fit for purpose and if it is found to not be fit for purpose the matter to be brought to the attention of the Tourism, Economy and Resources Scrutiny Committee for its consideration.						

Recommendation Three			
The Head of Licensing Services to			
investigate establishing a more			
stringent and rigorous driving test for			
horse drawn carriage operators. The			
new test should include:			
a) A theory test element			
b) Part of the test to be conducted off			
the public highway to examine			
drivers' control of the carriage and			
ability to perform manoeuvres, as			
well as testing on animal husbandry			
and attaching the dung catching			
device.			
c) An increased amount of test time			
on the promenade			
d) Following completion of the above			
elements of the new test, the Horse			
Drawn Carriage Operator should be			
given a 'provisional licence'. A full			
licence would then only be given			
following the completion of an			
appropriate number of supervised			
hours with an experienced Licensed			
Horse Drawn Hackney Carriage			
Operator. It was suggested that 100			
hours may be considered			
appropriate.			

Recommendation Four			
A comprehensive review of the			
Licensed Horse Drawn Hackney			
Carriage Policy and Fare structure be			
undertaken by the Head of Licensing			
Service.			
a) This review to be undertaken with			
the Highways Service and			
representatives of Licensed Horse			
Drawn Hackney Carriage Operators,			
in order to consider where it would			
be appropriate to prohibit U-turns on			
the promenade.			
Recommendation Five			
The Head of Licensing Services to			
investigate the cost and feasibility of			
ring-fencing part of the licence fee for			
clean-up operations during busy			
periods, with a view to allocating			
appropriate resources to reduce			
horse waste on the promenade in			
busy periods.			

Recommendation Six			
The Head of Licensing Services to investigate the possibility of having different, separate stands for horse drawn carriages and motorised licensed hackney carriage vehicles and dedicated change over areas.			
Recommendation Seven			
A dedicated Forum for Licensing Services and Licensed Horse Drawn Hackney Carriage Operators be established to meet three times per year. It was suggested those times be at the start, once during and after the main tourist season and that Licensing Services would administer			
that Forum.			