

<b>Committee:</b>	Licensing and Environmental Health	<b>Date:</b>	23 April 2018
<b>Title:</b>	Fees for Drivers, Hackney Carriage and Private Hire Vehicles and Private Hire Operators		
<b>Report Author:</b>	Amanda Turner, Licensing Team Leader	<b>Item for decision:</b>	Yes

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## Summary

1. On 24 January 2018 the Licensing and Environmental Health Committee approved the proposed fee structure to come into effect on 3 April 2018.
2. This report considers the responses to consultation on the proposed increases to the fees relating to hackney carriage and private hire vehicles and private hire operators licences.
3. As objections have been received on this matter the Committee must consider whether the variation to fees will come into force with or without modification.

## Recommendations

4. That the Licensing and Environmental Committee approve the proposed fee structure attached at Appendix B, to take effect on 1 May 2018, notwithstanding the objections received during the consultation period.

## Financial Implications

5. There are cost implications to the Council in undertaking this statutory service, but the legislation requires the Council to recover its costs in administering the scheme and ensuring compliance.

## Background Papers

6. None

## Impact

Communication/Consultation	On 1 February 2018 all Operators and Hackney Carriage proprietors and the Trade Association were emailed and advised of the proposed fee structure. This was also advertised in 2 local newspapers circulating the District of Uttlesford and also on the Uttlesford website.
Community Safety	A principle purpose of the licensing of hackney carriages and private hire drivers, vehicles and operators is safeguarding the

	public
Equalities	None
Health and Safety	None
Human Rights/Legal Implications	<p>Sections 53 and 70 of the Local Government (Miscellaneous Provisions) Act 1976 (“the Act”) allow the Council to charge fees for the grant of licences in respect of hackney carriage and private hire drivers, vehicles and operators. The legislation specifies the elements that can be included in the cost of the licence fee.</p> <p>In accordance with section 70 of the Local Government (Miscellaneous Provisions) Act 1976, there is a legal requirement for the Council to undertake a public consultation on any proposal to increase hackney carriage and private hire vehicle and Operators fees and charges.</p>
Sustainability	None
Ward-specific impacts	None
Workforce/Workplace	None. The fees that would take effect from 1 May 2018 do not take into account recommendations arising from a review of licensing that is currently taking place.

## Situation

7. The Council is required to review the fees relating to hackney carriage and private hire vehicles and private hire operators licences to ensure full cost recovery of the licensing service in relation to the relevant cost centres.
8. On 24 January 2018, following a review of the Council’s licensing fees and charges, members of the Licensing and Environmental Health Committee approved the fee structure presented to them in Appendix B.
9. There is a requirement for the council to undertake a formal consultation and consider any objections received prior to implementing any increase.
10. Objections were received and the increase in fees which were due to come into effect on 3 April was postponed as it was prudent to seek Counsel’s advice on the matters in paragraph 13 below. The Committee was advised of this on 21 March 2018.

## Consultation

11. Emails detailing the proposals were sent to the Chairman of the ULODA Taxi Trade Association, all licensed private hire operators and hackney carriage proprietors. A statutory notice was placed in the Saffron Walden Reporter and Dunmow Broadcaster on 1 February 2018 displaying the proposed fees and advising that any objections should be received by 28 February 2018. A notice was also placed on the Council's website.
12. Nine responses were received of which five were from ULODA, two from individual Hackney carriage proprietors and two from licensed drivers of a private hire operator. The responses received can be seen in Appendix D.
13. A meeting of Officers was held with the trade organisation on 9 March 2018 to go through each of the responses received in detail and answer any questions raised by Members of the Trade.
14. The trade asked for clarification on one point concerning what areas of licensing enforcement can be included in the fees.
15. The trade were informed that no prosecution costs had been included in the calculations. However in additional Legal advice was sought which has confirmed that areas previously calculated in relation to the cost of pre application checks and enforcement administration can be appropriately included in the calculations, continuing the council's previous practice.

## Considerations

16. The previous fee increase was approved and came into effect on 1 October 2015. There has been no increase in taxi fees during the years of 2016 and 2017 but the council's costs have inescapably increased to a level that requires the increase in fees proposed.
17. All representations made during the consultation period have been addressed.
18. The legal advice received confirms that the fees have been calculated correctly and that no changes are required to the new fees proposed in the previous report of 24 January 2018 on that ground.
19. Having considered the objections received during the consultation Members are requested to approve the proposed fee structure attached as Appendix B to take effect on 1 May 2018.

## Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
Fees are set at a level in excess of that required to cover the cost of	1 – in preparing the proposed fees officers have	2 – a surplus would be generated which could	To minimise the risk of challenge to the fees and charges they are designed to meet, but

the Licensing Authority	kept costs to an absolute minimum	be countered by a reduction in future years	not exceed, the cost the Council reasonably believes will be incurred in the issuing of licences and the administration of the service
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1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.

## Appendix A

### TAXI LICENSING SPEND AND INCOME FOR 3 YEARS FROM 2016/17 TO 2018/19

Since 1st Oct 2015, driver licences have been issued for a period of 3 years and operator licences for a period of 5 years. Vehicle licences continued to be issued for a period of 1 year. As a result of this change it is necessary when examining the costs and income from taxi licensing to observe them over a number of years to discern the underlying deficit the service operates under. Ideally one would use a duration equal to the lowest common multiple of the licences' durations i.e. 15 years. However, given the relatively low value of the operator licence income stream in comparison with the other 2 income streams it will suffice for our purposes to observe the income and costs of the council's taxi licensing operations over a 3 year period.

	2016-17	2017/18 Projected	2018/19 Projected (at current fees)
All figures have been rounded to the nearest hundred			
<b>Costs relating to the whole of Council's licensing functions (i.e. premises, animal, taxis etc.)</b>			
Staffing costs	117,000	141,700	175,600
Seminars	2,400	4,000	4,000 Note 1
Supplies	600	0	600 Note 2
Subscriptions	400	500	500 Note 3
Management	40,900	41,700	42,500 Note 4
Accountancy	3,100	3,100	3,200
Legal	39,200	40,000	40,800 Note 5
Internal audit	2,100	2,200	2,200 Note 6
Human resources	6,800	6,900	7,000 Note 7
Printing	4,000	4,100	4,200 Note 8
Mailroom	4,600	4,700	4,800 Note 9
Customer services section	17,300	17,600	18,000 Note 10
ICT	31,400	32,000	32,600 Note 11
Accommodation	15,800	16,100	16,400 Note 12
<b>Total costs relating to the whole of the licensing function</b>	<b>285,600</b>	<b>314,600</b>	<b>352,400</b>
<b>Share of costs relating to taxi licensing =67% (2/3rds)</b>	<b>191,400</b>	<b>210,800</b>	<b>236,100</b>
<b>Costs relating exclusively to Taxi licensing</b>			
Driver CRBs	16,300	15,000	15,000
Driver checks	7,600	7,900	7,900
Advertising	100	100	100 Note 13
Taxi plate materials	9,800	10,100	10,200
Legal	0	1,000	0
Enforcement	70,900	72,300	73,700 Note 14
<b>Total costs relating exclusively to taxi licensing</b>	<b>104,700</b>	<b>106,400</b>	<b>106,900</b>
<b>Total costs attributable to taxi licensing</b>	<b>296,100</b>	<b>317,200</b>	<b>343,000</b>
<b>Taxi licensing income</b>			
Taxi Operator licence income	13,500	2,800	1,400
Taxi vehicle licence income	85,100	99,400	107,600
Taxi driver licence income	148,800	102,300	197,000
Reimbursement of CRB costs	16,600	15,000	15,000
<b>Total income from taxi licensing</b>	<b>264,000</b>	<b>219,500</b>	<b>321,000</b>
<b>Net (deficit)/surplus on taxi licensing</b>	<b>(32,100)</b>	<b>(97,700)</b>	<b>(22,000)</b>
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Balance brought forward on licensing reserve at 1st April 2016	17,000		
Transfer of licensing deficit to licensing reserve	(17,000)		
Balance carried forward on licensing reserve at 31st March 2017	0		

## Appendix A continued

Note 1: Training related expenses

Note 2: Stationery and equipment

Note 3: Professional Subscriptions to The Institute of Licensing

Note 4: Management - made up of two elements; corporate management and direct service management. Corporate management is apportioned to services on staff numbers and direct service mgmt based on % time allocation

Note 5: Legal Services Team general licensing work - the recharge is based on % time allocation

Note 6: Internal Audit Service - the recharge is based on % average of the 3 year Audit Programme

Note 7: Human Resources Service - the recharge is apportioned to services based on staff numbers

Note 8: In-house Print Service - supplies paper etc

Note 9: Includes Postage costs and admin element

Note 10: Customer Service Centre is the first point of contact with the Council and covers, receptions, telephony and cashiering. The costs are recharged to services based on % time allocation

Note 11: Information Communication Technology Service providing system support - the recharge is based on a combination of the number of PCs and telephones as well as software costs

Note 12: Saffron Walden office premises costs and stewarding - apportioned to services based on floor space occupied

Note 13: Advertising of new fees

Note 14: Enforcement Team - the recharge is based on % time allocation

## Appendix B

### SUMMARY OF PROPOSED CHANGES IN LICENSING FEES FROM 1ST APRIL 2018

	Current fee (Oct 2015) £	Proposed fee £	Increase	Cost per week for proposed fee (£)	Workings reference
Drivers - 3 years					
New licence	140	173	23.6%	1.11	W1
Renewal of licence	129	160	23.7%	1.02	W2
Drivers - 2 years					
New licence	110	127	15.5%	1.22	
Renewal of licence	99	114	15.2%	1.10	
Drivers - 1 year					
New licence	80	91	13.8%	1.75	
Renewal of licence	69	77	11.6%	1.48	
Vehicle					
New licence	50	58	16.9%	1.12	W3
Renewal of licence	42	47	12.6%	0.91	W4
Transfer of licence	23	40	73.9%	0.77	W7
Operator					
New licence	350	427	21.9%	1.64	W5
Renewal of licence	346	420	21.3%	1.61	W6

### EFFECT ON TAXI LICENSING OPERATIONAL DEFICIT FROM PROPOSED INCREASE IN LICENCE FEES

	2016-17	2017/18 Projected	2018/19 Projected
Net (deficit)/surplus on taxi licensing at current licence fees	(32,100)	(97,700)	(22,000)
Increase in income from proposed rise in fees	52,100	38,800	61,800
Net (deficit)/surplus on taxi licensing after proposed rise in fees	20,000	(58,900)	39,800

So over a 3 year cycle the proposed increase in licence fees is projected to result in a breakeven position i.e. the costs of running the licensing function are matched by the income generated from taxi licensing.

## Appendix C

### W1 ANALYSIS OF CHANGE IN DRIVER NEW LICENCE FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	140	173	31%	
<b><u>DATA BEHIND CALCULATION OF THE FEE</u></b>				
Total number of minutes work	253	294	21%	Note 1
Average employee salary cost per hour	18.9	22.9	21%	
Average employee admin cost per hour	2.0	1.4	-29%	
Average employee recharge cost per hour	10.0	8.6	-14%	
Total avg employee cost per hour (sum of 3 rows above)	30.9	32.9	6%	
<b>Total employee costs (mins/60 x Total avg employee cost p/h)</b>	<b>130.3</b>	<b>161.0</b>		
<b>Materials/Advertising/Driver checking costs</b>	<b>12.0</b>	<b>12.0</b>	0%	
<b>Total cost of work</b>	<b>142</b>	<b>173</b>		Note 2

**Note 1:** Reason for increase in number of minutes (only tasks where timings differ are shown)

	Minutes in fee set Oct-15	Minutes in fee proposed Apr-18	% change	
Application process	73.0	86.0	18%	
Case notes	11.0	9.0	-18%	
Committee work	33.0	32.6	-1%	
Work during years 2 and 3 of the licence	76.0	74.0	-3%	
Emails	14.0	25.4	81%	Note 3
Letters	5.0	1.0	-80%	
Phones	19.0	20.6	8%	
Right to work	0.0	5.7		Note 4
Pre application checks by enforcement team	1.0	19.0	1800%	

**Note 2:** Original workings for the Oct 2015 fee indicate fee should have been £142 instead of £140

**Note 3:** Greater time spent on emails due to taking into account time spent dealing with emails sent as well as received (in the past only time spent on emails received were included in the costing)

**Note 4:** Time taken undertaking 'Right to work' checks was not included in the costing of the fee set in Oct 2015



## Appendix C continued

### W2 ANALYSIS OF CHANGE IN DRIVER RENEWAL LICENCE FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	£129	£160	24%	
<b>DATA BEHIND CALCULATION OF THE FEE</b>				
Total number of minutes work assumed	231	270.7	17%	Note 1
Average employee salary cost per hour	19	22.9	21%	
Average employee admin cost per hour	2	1.4	-30%	
Average employee recharge cost per hour	10	8.6	-14%	
Total avg employee cost per hour (sum of 3 rows above)	<u>31</u>	<u>32.9</u>	6%	
<b>Total employee costs</b> (mins/60 x Total avg employee cost p/h)	<b>119</b>	<b>149</b>	25%	
<b>Materials/Advertising/Driver checking costs</b>	<u>11</u>	<u>11</u>	0%	
<b>Total cost of work</b>	<b>130</b>	<b>160</b>	22%	Note 2

Note 1: Reason for increase in number of minutes (only tasks where timings differ are shown)

	Minutes in fee set Oct-15	Minutes in fee set Apr-18	% change	
Application process	63.3	68.0	7%	
Case notes	9.7	8.7	-11%	
Committee work	30.0	32.6	9%	
Work during years 2 and 3 of the licence	69.8	74.0	6%	
Emails	13.4	25.2	88%	Note 3
Letters	4.3	1.1	-75%	
Phones	17.4	20.6	18%	
Pre application checks by enforcement team	1.5	19.0	1179%	

Note 2: Original workings behind the Oct 2015 fee indicate the fee should have been £130 rather than £129

Note 3: Greater time spent on emails due to taking into account time spent dealing with emails sent as well as received (in the past only time spent on emails received were included in the costing)

## Appendix C continued

### W3 ANALYSIS OF CHANGE IN VEHICLE NEW LICENCE FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	50.0	58.4	16.9%	
<b><u>DATA BEHIND CALCULATION OF THE FEE</u></b>				
Total number of minutes work	102.0	103.3	1.3%	
Average employee salary cost per hour	14.8	18.6	25.7%	
Average employee admin cost per hour	1.9	1.5	-21.1%	
Average employee recharge cost per hour	8.8	7.1	-19.3%	
Total avg employee cost per hour (sum of 3 rows above)	<u>25.5</u>	<u>27.2</u>	6.7%	
<b>Total employee costs</b> (mins/60 x Total avg employee cost p/h)	<b>43.4</b>	<b>46.8</b>	8.0%	
<b>Materials/Advertising/Driver checking costs</b>	<b>8.6</b>	<b>11.6</b>	35.2%	<b>Note 1</b>
<b>Total cost of work</b>	<b>51.9</b>	<b>58.4</b>	12.5%	<b>Note 2</b>

**Note 1:** Advertising of new fees and equipment (plates etc)

**Note 2:** Workings behind the Oct 2015 fee indicate cost should have been £51.9 rather than £52

### W4 ANALYSIS OF CHANGE IN VEHICLE RENEWAL LICENCE FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	42.0	47.3	12.6%	
<b><u>DATA BEHIND CALCULATION OF THE FEE</u></b>				
Total number of minutes work	93.9	92.3	-1.7%	
Average employee salary cost per hour	15.1	18.7	12.4%	
Average employee admin cost per hour	1.9	1.5	-17.9%	
Average employee recharge cost per hour	8.9	6.8	-19.7%	
Total avg employee cost per hour (sum of 3 rows above)	<u>25.9</u>	<u>27.0</u>	-1.2%	
<b>Total employee costs</b> (mins/60 x Total avg employee cost p/h)	<b>40.5</b>	<b>41.5</b>	2.3%	
<b>Materials/Advertising/Driver checking costs</b>	<b>3.2</b>	<b>5.8</b>	82.4%	<b>Note 1</b>
<b>Total cost of work</b>	<b>43.7</b>	<b>47.3</b>	8.2%	<b>Note 2</b>

**Note 1:** Advertising of new fees and equipment (plates etc)

**Note 2:** Workings behind the Oct 2015 fee indicate cost should have been £43.7 rather than £42

## Appendix C continued

### W5 ANALYSIS OF CHANGE IN OPERATOR NEW LICENCE FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	350.0	426.5	21.9%	
<b><u>DATA BEHIND CALCULATION OF THE FEE</u></b>				
Total number of minutes work	527.0	667.9	26.7%	Note 3
Average employee salary cost per hour	27.9	26.3	-5.7%	
Average employee admin cost per hour	1.1	1.0	-9.1%	
Average employee recharge cost per hour	10.4	11.0	5.8%	
Total avg employee cost per hour (sum of 3 rows above)	39.4	38.3	-2.8%	
<b>Total employee costs</b> (mins/60 x Total avg employee cost p/h)	<b>346.1</b>	<b>426.3</b>	23.2%	
<b>Materials/Advertising/Driver checking costs</b>	<b>8.8</b>	<b>0.2</b>	-97.7%	Note 1
<b>Total cost of work</b>	<b>354.9</b>	<b>426.5</b>	20.2%	Note 2

**Note 1:** The fall in this cost is due to a fall in the advertising cost which is in turn caused by a combination of fall in cost of placing adverts as well as the costs being shared out among far greater number of vehicle licences than first anticipated (advertising is carried out jointly for change in vehicle and operator licence fees) as well as an assumption of a change in fees every 3 years instead of every year which of course only requires advertising every 3 years rather than annually.

**Note 2:** Workings for fee set in Oct 2015 indicate fee should have been £355 instead of £350

**Note 3:** Analysis of the main reasons for increase in the number of mins spent on new operator licence

	<u>Minutes for the fee</u>		diff
	Oct-15	Apr-18	
Case notes	81	23	-58
Committee work	133	110	-23
Emails	127	71	-56
Phone calls	81	55	-25
Pre application enforcement checks	36	338	302
			<u>140</u>

## Appendix C continued

### W6 ANALYSIS OF CHANGE IN OPERATOR RENEWAL LICENCE FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	346.0	419.7	21.3%	
<b><u>DATA BEHIND CALCULATION OF THE FEE</u></b>				
Total number of minutes work	519.0	655.0	26.2%	Note 3
Average employee salary cost per hour	28.1	26.4	-6.0%	
Average employee admin cost per hour	1.1	1.0	-9.1%	
Average employee recharge cost per hour	10.4	11.0	5.8%	
Total avg employee cost per hour (sum of 3 rows above)	39.6	38.4	-3.0%	
<b>Total employee costs</b> (mins/60 x Total avg employee cost p/h)	<b>342.5</b>	<b>419.2</b>	22.4%	
<b>Materials/Advertising/Driver checking costs</b>	<b>8.8</b>	<b>0.5</b>	-94.3%	Note 1
<b>Total cost of work</b>	<b>351.3</b>	<b>419.7</b>	19.5%	Note 2

**Note 1:** The fall in this cost is due to a fall in the advertising cost which is in turn caused by a combination of fall in cost of placing adverts as well as the costs being shared out among far greater number of vehicle licences than first anticipated (advertising is carried out jointly for change in vehicle and operator licence fees) as well as an assumption of a change in fees every 3 years instead of every year which of course only requires advertising every 3 years rather than annually.

**Note 2:** Workings for fee set in Oct 2015 indicate fee should have been £351 instead of £346

**Note 3:** Analysis of the main reasons for increase in the number of mins spent on new operator licence

	Minutes per fee		diff
	Oct-15	Apr-18	
Application process	33	30	-3
Case notes	81	23	-58
Committee work	133	110	-23
Emails	127	71	-56
Phone calls	81	55	-25
Pre application enforcement checks	36	338	302
			<u>137</u>

## Appendix C continued

### W7 ANALYSIS OF CHANGE IN VEHICLE LICENCE TRANSFER FEE

	Fee set in Oct-15	Proposed fee Apr-18	% change	Notes
Fee	23.0	40.0	73.9%	
<b><u>DATA BEHIND CALCULATION OF THE FEE</u></b>				
Total number of minutes work	54.0	90.0	66.7%	
Average employee salary cost per hour	15.1	18.7	12.4%	
Average employee admin cost per hour	1.9	1.5	-17.9%	
Average employee recharge cost per hour	8.9	6.8	-19.7%	
Total avg employee cost per hour (sum of 3 rows above)	25.9	27.0	-1.2%	
<b>Total employee costs</b> (mins/60 x Total avg employee cost p/h)	<b>23.3</b>	<b>40.4</b>	73.5%	
<b>Total cost of work</b>	<b>23.3</b>	<b>40.4</b>	73.5%	

## Appendix D

Written responses received to the 28 day fee consultation are shown below:

- A Members have previously insisted on seeing any justification for Increases (or for no increases) based on detailed costings, and on being assured that officers have consulted with the trade delegation. They've wanted to satisfy themselves in advance of the budget year that the proposals have been agreed between officers and the trade to be justified, fair and reasonable BEFORE they finally approve them.

*Officers reported that when previous fee increases took place a pre-meeting did take place as this was involving using up the surplus or the Act changing so the period of a licence was different. Now this is not the case ULODA and all other licensed proprietors would have time to make any representations during the 28 day consultation period following the meeting.*

- B There are no visible Licensing Accounts to provide the baseline. Is the 2016-17 column in Appendix A the "actuals" for the year? The box in the bottom left hand corner includes a statement about the Licensing Reserve but these are just words, with no supporting figures in transparent Licensing Accounts format - to which we became accustomed.

*Our Accountant reported Appendix A gives the base deadline and shows the actual costs. The 2016/17 column is Actuals.*

- C The detailed projected costings in Appendix A. The biggest increase is in staffing costs, yet there is no indication of why, or whether this "hides" an increase in staff (likely, we think) and if so what grade or level is anticipated and to what activity will the resource be allocated? It's good to note a continuing emphasis on the containment of costs, but we must ask yet again why is Enforcement charged to the trade when there is case law to support its being borne by a central cost centre/reserve and retained there or allocated elsewhere?

*The enforcement issue will be dealt with in point E. Appendix C shows grade of staffing involved and timings. In 2016/17 there was an additional part-time admin post. Appendix C explains that the increase from £117,000 to £175,000 is due to the number of licences being processed.*

- D Appendices A and B contain no justification for any of the individual proposed changes. There is no narrative to indicate the assumptions

on which they are based. Why the proposed massive increase (73.9%!) in the transfer fee for vehicle licences? Also, we are used to seeing the council's forecast increase in the numbers of drivers, vehicles and operators to help explain the increases in income. What volume is being assumed in numbers of new driver, vehicle and operator licences? A related question is what "churn" effect has been assumed? This will impact on retained income from licence fees as there is no provision for early repayment.

*Transfer fees have the highest percentage increase due to not being included in the last fee increase structure, consequently this fee has not increased since 2010.*

- E Both driver and operator new licences and renewals are showing the new elements of prosecution work and cautions in the costings. None of us can remember seeing these elements before and we must challenge their inclusion as inappropriate - at a time when Enforcement Officers are claiming to be sponsoring far fewer committee hearings and prosecutions, with the emphasis moving to informal advice and education, which we have long sought as the preferred, modern and proportionate way of treating offenders.

*We have always charged an element for administration pre-checks. We are aware of what we can charge for. The description was incorrect and should have read enforcement administration, eg. going to check if an office is really being used, speaking to drivers who have points on their licence they haven't declared. Was previously shown in a different area under phone calls and e-mails. This figure has gone down and been moved across.*

- F Just my input 23% is a bit steep considering even over the past 5 years added up is only about 13% inflation. Plus 5.99% council tax/mortgage's/index retail rises. At 4.1%. Where do they expect people to find the extra money for these increases. I wish i could get between 10-23% increase. Plus we haven't had a increase for 5 years.

*This comment relates to Table of Fares increase. The last increase was in October 2012. It was agreed at Licensing Committee in November 2004 the trade can put in a written request anytime they feel it necessary for an increase in fares.*

- G (received twice from 2 individuals) Following on from the notice posted recently regarding the increase in Taxi Licensing fee's I would like to object to the proposal. The increase is far in excess of any inflation related increase since 2015 – even if you took a 3.5% annual RPI rise for two years, the increase should only be around 7%. The proposed increases are far in excess of that.

	Existing fee	Proposed fee	% Increase
Private Hire Vehicle	£50 new (1 year licence)	£58 new (1 year licence)	16%
	£42 renewal (1 year licence)	£47 renewal (1 year licence)	11.9%
	£23 vehicle transfer	£40 vehicle transfer	73.9%
Hackney Carriage Vehicle	£50 new (1 year licence)	£58 new (1 year licence)	16%
	£42 renewal (1 year licence)	£47 renewal (1 year licence)	11.9%
	£23 vehicle transfer	£40 vehicle transfer	73.9%
Private Hire Operator	£350 new (5 year licence)	£427 new (5 year licence)	22%
	£346 renewal (5 year licence)	£420 renewal (5 year licence)	21.4%

The increase seems to be based on the requirement to fill a shortfall in funding at the council. Whilst I understand that funding requirements have to be met, I do not agree that the cost of this should be passed disproportionately onto the taxi industry. Costs and budget management exercises, should be utilised within the department so that shortfalls do not occur, and if necessary the use of standard austerity measures currently being implemented across all levels of council and government and business should be utilised, and not merely pass the costs onto the end user. I would strongly like to request a review of the current proposal and a reduction in the increase down to a more suitable and fair level.

*The principle is the fees are cost recovery and not capped to RPI.*

H My main concern as a stakeholder is that I have not seen or have been made aware of any audited accounts of the costs associated with managing the issue of Taxi Licenses prior to approval of the very significant increase, this is against a backdrop of Hackney tariffs being the same for around 4 years. I well recall a few years ago the debacle caused by trying to force through inaccurate accounts which had been burden with costs associated with taxi licensing by the then incumbent senior enforcement officer, which resulted in the need to reimburse licence holders for over charging which itself was poorly managed and resulted in lower costs to new licence applicants that did not incur the excessive charges. The current proposed increase for new driver licenses represents an increase of 23.5% and renewals 24% is frankly outrageous without audited accounts to support such increases. Plus what is the rationale for increasing renewals at a higher percentage rate? there must be less work to do than for a new applicant.

Looks like my maths was wrong. New calculations are: The increase for new licenses is 16% and for renewals 11%, and for new operator license, 22%. Still very high. May I ask you to forward this correction to Mr Cobden.

*The councils accounts are audited annually by our external auditor.*



