

Appendix 4

Summary of Objections to consultation re proposed new fees policy (31 st March 2016 to 28 th April 2016)				
App Ref.	Respondent	Comment	Licensing Authority Appraisal	Licensing Authority Response
App 5	David Harwood Abigail Exelby Roy Pearse Niwsor Burws Craig W Fox Richard Cobden Jeffary Spreadbury Drivers From Starline	(a) Object to the increase in PH Driver Licences. Increase should be over a longer period. Propose stepped increase over 3 years. (b) Drivers already having to absorb a 10% increase in parking charges. (c) 3 year licence cannot be obtained by those who are 60 years of age and over, as have to have an annual medical check.	(a) Noted that drivers who do not own their vehicles will not be able to offset increase with reduction in vehicle fee. Point made that by taking 3 year licence there will only be an increase of £10 a year, although acknowledged that this will require a lump sum to be paid up front. It is felt that the fees accurately reflect the costs that are associated with 'issuing and administering' driver licences. (b) Fees can only be set based on the cost of delivering the taxi and private hire licensing regime. (c) This is incorrect. Permissible for someone 60 or over to obtain a 3 year licence, but a medical will be requested annually by the Licensing Team. If there are any significant medical issues then the driver can be placed before Committee to determine their fitness.	(a) Consideration could be given to offering a 5% discount on the fees proposed to drivers? (b) No Policy change. (c) Clarification provided to objectors.
App 6	Graham Price Hackney Carriage Driver	(a) The cost of a 3 year driver licence should be the same as that for an annual licence	(a) It is believed that there can be an increase over the annual fee. Jim Button News Bulletin from Dec 2015 (Page 2) states 'Whilst there can be some increase over the basic annual fee, it must be carefully calculated to fall within the limitations imposed'.	(a, b, c & d) Consideration could be given to offering a 5% discount on the fees proposed to

<p>App 6 (Cont)</p>	<p>Graham Price (Cont) Hackney Carriage Driver</p>	<p>(b) The cost of issuing a licence (the administration cost) is the same whether that licence runs for a day or 3 years.</p> <p>(c) I was under the impression that drivers badges were ring fenced and they could only charge what it cost to produce that licence.</p> <p>(d) The Law Commission report stated that a 3 year badge should not cost more than a 1 year one</p>	<p>(b) For calculating the 3 year driver licence fee, there are some tasks that are a flat rate, linked solely to the application itself, that will not change regardless of the duration of the licence i.e. the production of the licence, badges etc. There will be some tasks where the costs need to be multiplied as these will be annual costs that need to be extended across the full duration of the licence, such as dealing with technical issues with applications, complaints and any conduct issues that result in a Hearing or officer involvement etc.</p> <p>(c) One element of taxi licensing cannot be used to subsidise another i.e. the vehicle fee cannot be increased to reduce the driver fee. In terms of what can be charged for in relation to drivers, the legislation states the 'issue and administration'. A broad interpretation of the term 'administration' has been made to include the maintenance of the licence to include compliance with the terms of the licence i.e. complaints, conduct issues etc.</p> <p>(d) The law commission report has been checked and states at Para 10.8 'The change is aimed at reducing the financial and administrative burden associated with shorter licence periods'. It does not expressly state that a 3 year licence should cost the same or less than a 1 year licence. No statutory guidance has been issued by</p>	<p>drivers?</p>
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			Central Government to give Local Authorities a steer on how to implement these changes. At 10.11 of the LC Report it states – ‘It (Legislation re driver’s licence fee) does not expressly allow fee revenue to be applied to cover enforcement costs in respect of drivers and operators... This may be regarded as an anomaly’.	
App 7	Malcolm Cannon Manager at Starline	(a) Objecting to the ‘extortionate’ increase in driver’s fee. Believes that renewal fee increase of 33% and new app fee increase of 65% is not justifiable. <i>‘As someone that has held a Chichester District Council licence for 28 years I find this completely unacceptable and will certainly have to consider carefully whether to renew if these huge hikes are implemented’.</i>	(a) Officers are satisfied that a realistic and accurate calculation of the costs associated with a driver’s application have been made.	(a) Consideration could be given to offering a 5% discount on the fees proposed to drivers?