

Local Transport Authority Consultation – Newcastle-under-Lyme BC

This response has been submitted on behalf of Newcastle-under-Lyme Borough Council in its capacity as the current licensing authority for administering the taxi licensing regime and is based upon the current position that the Local Transport Authority is Staffordshire County Council and not any new LTA created by Local Government Reorganisation.

Consultation questions for local authorities

Questions to local authorities who are currently responsible for taxi and private hire vehicle licensing

If all local transport authorities were made responsible for taxi and private hire vehicle licensing as proposed, would your local authority expect:

Question 1: Any one-off costs? If so, what would the one-off costs to your authority be for? How much would the costs be? Please provide a monetary value in pounds, if possible, otherwise the resource time required in hours.

- *It is considered likely that staff would be transferred from existing Licensing Authorities (LAs) to Local Transport Authorities (LTAs) to ensure a smooth transition of services with appropriate experience, knowledge and skills being required for this. There may be costs associated with the transfer of employees from one authority to another and any recruitment process required;*
- *The LAs will hold a stock of taxi related consumables, used to create vehicle plates and badges, that would become obsolete.*
- *It is not considered possible to estimate a monetary value or time resource without further detail of the proposals.*

Question 2: Any ongoing costs? If so, what would the ongoing costs to your authority be for? How much would the additional costs be? Please provide a monetary value in pounds, if possible, otherwise the resource time required in hours.

- *There will be ongoing taxi licensing appeals which would presumably stay with the current LA until resolved (approx. £2500-3000 per appeal at Magistrates' Court for this LA). This LA has circa 10 appeals ongoing at any one time. Some of these costs are recovered when the appeals are dismissed and costs are awarded.*
- *The LA would lose income from taxi and private hire vehicle testing, and it would also effect the staffing and resources required within the in-house garage;*
- *It is not considered possible to estimate a monetary value or time resource without further detail of the proposals.*

Question 3: Any one-off savings? If so, what would the savings to your authority be for? How much would the savings be? Please provide a monetary value in pounds, if possible, otherwise the resource time required.

- *No one-off savings have been identified.*

Question 4: Any ongoing savings? If so, what would the savings to your authority be for? How much would the savings be? Please provide a monetary value in pounds, if possible, otherwise the resource time required.

- *If staff were transferred from the LA to the LTA, then there would be ongoing savings related to salary and oncosts of those employees. For example, an FTE employee on the top of Grade 5 would generate a saving of £37,804 per annum at current rates. On the top of Grade 8 that would increase to £50,324.*
- *The LA would no longer have to pay the software licence costs for those members of staff who are transferred to the LTA. However most LAs use the same system to cover multiple licensing regimes so it is unlikely that entire systems costs could be saved;*

- *The LA would no longer have to procure third parties to conduct training and licence criteria, including but not limited to Safeguarding, Disability Equality and DBS applications;*
- *The LA would no longer be required to hold committees/panels to determine cases;*
- *The LA would no longer have to undertake/procure taxi licensing training for Members, officer and legal support;*
- *Staff wages (and associated costs) would reduce if employees transferred to the LTA;*
- *In many LA's there are not dedicated taxi licensing teams. They are multi-disciplinary dealing with a range of licensing topics, such as Licensing Act 2003, Gambling Act 2005, Scrap Metal Dealers, charity collections etc. There would be a disaggregation of staff which would need to be time accounted to ensure that authorities remain/become suitably resourced;*
- *It is not considered possible to estimate a monetary value or time resource without further detail of the proposals.*

Consultation questions for all respondents

Consultation questions on proposals

Question 13: Should all local transport authorities be responsible for taxi and private hire vehicle licensing? Why?

- *Consistency is key to whether the proposal would create the intended benefits;*
- *The proposal would reduce the overall number of taxi licensing policies and in turn provide more consistency for those in and entering the trade, as well as the regulators;*
- *The proposals must be considered alongside the outcomes of the recent call for evidence from the Transport Committee and the proposed clause in the English Devolution and Community Empowerment Bill to allow for the creation of 'national **minimum** standards'. It is this Council's view that these should be national **absolute** standards and new national legislation otherwise there will always be inconsistencies;*
- *The proposals must also be considered alongside the Local Government Reorganisation process to avoid the scenario where taxi licensing moves to one LTA which is then either split into smaller unitary Councils, or forms part of a wider Strategic Authority and would have to be moved a second time;*
- *There would need to be considerations as to how taxi licensing appeals would be dealt with. If the LTA is across a much wider area, then perhaps the appeals could take place in any court in that region which may speed up listing times;*
- *It would allow for wider considerations in relation to emissions standards, de-carbonisation strategies and associated matters;*
- *Larger areas would reduce the number of 'cross-border' or 'working out of area' cases and allow for greater use of existing enforcement powers, however it would not necessarily remove the factors that lead applicants to 'licence shop' unless there were 'national **absolute** standards' and new legislation as previously mentioned.*

Consultation questions on economic benefits and costs

Question 14: Are there wider economic benefits in making all local transport authorities responsible for taxi and private hire vehicle licensing? If so, what are they?

- *Operators would require fewer licences to operate across wider areas;*
- *Taxi fares would become more uniform across the wider areas providing more parity for customers who travel across those areas;*
- *Economies of scale would increase enabling consistency in fee setting, levels of compliance activity and decision making.*

Question 15: Are there other costs in making all local transport authorities responsible for taxi and private hire vehicle licensing? If so, what are they?

- *There would need to be staffing structures created within each LTA for the taxi and PHV regime which may require recruitment processes and the involvement of support services such as HR, Legal and ICT;*
- *The LTAs would need to put in an Elected Member framework for any regulatory oversight required and any committee/panel led decision making processes;*
- *LTAs will need to procure software to manage the licensing regime if they do not already host appropriate software;*
- *LTAs would have to procure providers for consumables, training courses etc;*
- *There are elements of taxi licensing that are explicitly an 'Executive function' e.g. setting of Hackney Carriage metered fares. Unless addressed with the transition this would need to be considered.*