

Mandy Beever

From:
Sent: 05 October 2013 08:49
To: Paul McGréary
Cc: Mandy Beever
Subject: Planned amendment to Licensing fees

Hi Paul,

Hope you are well.

Wanted to drop you line on the above subject, following reading the item re new fees and hearing the responses from some of the other traders.

It may come as a bit of a surprise to you, considering the opinions of others, but I am in agreement with the new fee scales.

Firstly, yes, the initial fee for a first time badge application has increased, but then the amount of work involved in checks etc for a first time application are more detailed than that of a renewal.

I see that some people are complaining that the 3 year badge will have increased by 26%. However, they fail to think about the fact that this is over three years and therefore its actually 8.5%pa. Furthermore, they fail to mention, that the operators fee if you are a small business, which the ones that were doing the complaining are, has actually come down by some £47pa.

Although the next fee to mention is not relevant to my business, I still agree with it. That's the massive increase on the operators fees for those companies that are carrying a large number of cars. For a long time I have wondered why an operator of a business with 5 cars or less pays the same as a firm with 200 or more. At least now the fee reflects the amount of work involved is proportionate to the size of the firm being licensed. Also, these firms need to realise that the fee is not just for the issuing of the license but also for the work involved on behalf of the Licensing department during the term of the Licence granted. This is where the proportionate part comes in surely.

One thing I must agree with though, which has been mentioned by all the traders that are complaining, is the issue regarding not being able to get hold of a Licensing officer when you need to. I am aware that new systems have been brought in re appointment systems etc and am also aware of the fact that staff are due to leave the department, making the job of those remaining even more stretched than before perhaps. However, there is a big difference between not being able to get hold of an officer and seeing this as not getting the service that we are paying all these fees for and being able to get hold of someone that takes all the details. This latter approach at least feels like something has been done and matters are in hand. Please don't confuse this with the system we have had recently where a switch person answers the call and says they will get your details passed onto Licensing. For a start, this person is not Licensing trained. Knows nothing about the trade and is not able to triage the call for prioritising when the matter can be deal with.

In my opinion, if the matter of communication could be improved then the trade would have a lot less to moan about when referring to the Licensing department and the service they receive. This, to me, should be a priority for improvement.

--
Kind Regards

Mandy Beever

From: Paul McGreary
Sent: 05 October 2013 17:50
To:
Cc: Mandy Beever
Subject: Re: Planned amendment to Licensing fees

Hi

Good to hear from you and thanks for the feedback you make some very valid and sensible points. Will get a more substantive response to you next week as soon as I have chance to catch up with Mandy.

Regards

Paul

Dr Paul McGreary
Head of Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 253868

Mob: 07582 004 991

Web: www.shropshire.gov.uk

On 5 Oct 2013, at 08:49,

wrote:

- > Hi Paul,
- >
- > Hope you are well.
- >
- > Wanted to drop you line on the above subject, following reading the item re new fees and hearing the responses from some of the other traders.
- >
- > It may come as a bit of a surprise to you, considering the opinions of others, but I am in agreement with the new fee scales.
- >
- > Firstly, yes, the initial fee for a first time badge application has increased, but then the amount of work involved in checks etc for a first time application are more detailed than that of a renewal.
- >
- > I see that some people are complaining that the 3 year badge will have increased by 26%. However, they fail to think about the fact that this is over three years and therefore its actually 8.5%pa. Furthermore, they fail to mention, that the operators fee if you are a small business, which the ones that were doing the complaining are, has actually come down by some £47pa.
- >
- > Although the next fee to mention is not relevant to my business, I still agree with it. That's the massive increase on the operators fees for those companies that are carrying a large number of cars. For a long time I have wondered why an operator of a business with 5 cars or less pays the same as a firm with 200 or more. At least now the fee reflects the amount of work involved is proportionate to the size of the firm being licensed. Also, these firms

need to realise that the fee is not just for the issuing of the license but also for the work involved on behalf of the Licensing department during the term of the Licence granted. This is where the proportionate part comes in surely.

>
> One thing I must agree with though, which has been mentioned by all the traders that are complaining, is the issue regarding not being able to get hold of a Licensing officer when you need to. I am aware that new systems have been brought in re appointment systems etc and am also aware of the fact that staff are due to leave the department, making the job of those remaining even more stretched than before perhaps. However, there is a big difference between not being able to get hold of an officer and seeing this as not getting the service that we are paying all these fees for and being able to get hold of someone that takes all the details. This latter approach at least feels like something has been done and matters are in hand. Please don't confuse this with the system we have had recently where a switch person answers the call and says they will get your details passed onto Licensing. For a start, this person is not Licensing trained. Knows nothing about the trade and is not able to triage the call for prioritising when the matter can be deal with.

>
> In my opinion, if the matter of communication could be improved then the trade would have a lot less to moan about when referring to the Licensing department and the service they receive. This, to me, should be a priority for improvement.

>
>
>
> --
> Kind Regards

>
>
>
>

Mandy Beever

From: Mandy Beever
Sent: 06 October 2013 23:33
To: Paul McGreary
Subject: RE: Planned amendment to Licensing fees

Good Evening

Thank you for your email and the supportive comments you have made in regard to the proposed changes to Licensing fees.

In regard to your point about communication with the Licensing Team I can confirm that we currently have Licencing Officers available 9am until 12 o'clock each day to take calls direct from our customers. From 12 o'clock until 5pm our Customer Service Team take the details and pass them onto the Licencing Team to respond - the original no direct contact with Licencing staff was as we have previously discussed a temporary measure required at a time when Licencing were struggling with workloads and the introduction of the new computer system last year.

We are continually reviewing the service we offer and I have only last week discussed with the team how we can improve communication with our customers, I am proposing that very shortly we will again be in a position to take telephone calls directly throughout the day so that whenever a contact is made with the service it is with one of the Licencing Team and not just a Customer Service Advisor taking the details.

We are undertaking further work on other ways of communication and making the application process easier by introducing online applications but we are not ready to launch this, we want to make sure it is fully operational and tested by our 'Critical Friends' (volunteers from the trade) who have come forward to help us do the testing from a customers view.

I have read Paul's response to you and he has forgotten that I am on leave from the 7th to the 14th of October so we will not be able to catch up until after my return. I will discuss this with Paul and respond to you accordingly.

If you have any other comments or would like any further details please contact me - I will be picking up emails whilst I am on leave.

Kind Regards

Mandy

Mandy Beever
Team Manager Operational Community Safety Public Protection Shropshire Council Shirehall Abbey Foregate
Shrewsbury Shropshire
SY2 6ND

Tel: 01743 256106
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

-----Original Message-----

From:

Sent: 05 October 2013 08:49

To: Paul McGreary

Cc: Mandy Beever

Subject: Planned amendment to Licensing fees

Hi Paul,

Hope you are well.

Wanted to drop you line on the above subject, following reading the item re new fees and hearing the responses from some of the other traders.

It may come as a bit of a surprise to you, considering the opinions of others, but I am in agreement with the new fee scales.

Firstly, yes, the initial fee for a first time badge application has increased, but then the amount of work involved in checks etc for a first time application are more detailed than that of a renewal.

I see that some people are complaining that the 3 year badge will have increased by 26%. However, they fail to think about the fact that this is over three years and therefore its actually 8.5%pa. Furthermore, they fail to mention, that the operators fee if you are a small business, which the ones that were doing the complaining are, has actually come down by some £47pa.

Although the next fee to mention is not relevant to my business, I still agree with it. That's the massive increase on the operators fees for those companies that are carrying a large number of cars. For a long time I have wondered why an operator of a business with 5 cars or less pays the same as a firm with 200 or more. At least now the fee reflects the amount of work involved is proportionate to the size of the firm being licensed. Also, these firms need to realise that the fee is not just for the issuing of the license but also for the work involved on behalf of the Licensing department during the term of the Licence granted. This is where the proportionate part comes in surely.

One thing I must agree with though, which has been mentioned by all the traders that are complaining, is the issue regarding not being able to get hold of a Licensing officer when you need to. I am aware that new systems have been brought in re appointment systems etc and am also aware of the fact that staff are due to leave the department, making the job of those remaining even more stretched than before perhaps. However, there is a big difference between not being able to get hold of an officer and seeing this as not getting the service that we are paying all these fees for and being able to get hold of someone that takes all the details. This latter approach at least feels like something has been done and matters are in hand. Please don't confuse this with the system we have had recently where a switch person answers the call and says they will get your details passed onto Licensing. For a start, this person is not Licensing trained. Knows nothing about the trade and is not able to triage the call for prioritising when the matter can be deal with.

In my opinion, if the matter of communication could be improved then the trade would have a lot less to moan about when referring to the Licensing department and the service they receive. This, to me, should be a priority for improvement.

Mandy Beever

From:
Sent: 18 October 2013 13:01
To: Paul McGreary
Cc: Steve Charmley; Peter M Adams; Vernon Bushell; Joyce Barrow; Peter Cherrington; Steve Davenport; Andrew B Davies; Nigel Hartin; Keith Roberts; Richard Huffer; Roger Hughes; Robert Macey; Jon Tandy; Rosanna Taylor-Smith; Robert Tindall; Mandy Beever;
Subject: Proposed chargeable fees
Attachments: interior plate.jpg; fare card.jpg

Dear Paul McGreary.

Ref: Proposed chargeable fees

- 1) What is a hackney carriage proprietors licence? as published in "Shropshire Councils statutory proposed local Government (miscellaneous Act 1976 Section 53 & 70 dated 30th Sept 2013 fees & modifications .
- 2) Why is the proposed charge for new P/H vehicle licence more expensive than a hackney vehicle (purposed HC £150.00 / PH £160.00).
- 3) Why is the proposed H/C -P/H renewal more expensive than new application..?
- 4) Why is the proposed increase for the 240 mm x 180 mm perspex exterior licence plate (£13.00) cheaper than the laminated 150 mm x 120mm interior licence plate. (£15.00) ? (*See Attached*)
- 5) Why does the printed fare card cost £9.00 when local stationers can produce it for less than 9p and why is it not possible to down load from Shropshire Councils web site ? . (*see Attached*)
- 6) Why has the operators licence for fewer than 5 vehicles been reduced and operators with over 200 vehicles increase from £165-00 to £2,551.00.

- 7) What is the additional administrative charges (licence holder transfer / change of details of £10 referring to ?
- 8) How much has the online licence application cost to set up and how much will be saved by this procedure ?.
- 9) Does the proposed fee for a drivers badge include the crb barring and the D.V.L.A. fees. (can you make this clear in your papers.

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in

error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.



Shropshire
Council

**HACKNEY
CARRIAGE**

REGISTRATION NO:

VEHICLE TYPE:

EXPIRY DATE:

LICENSED TO CARRY:

05/09/2010

4 PASSENGERS

THIS PLATE BELONGS TO SHROPSHIRE COUNCIL

13800

VALID FROM 05/09/2010



HACKNEY CARRIAGE TABLES OF FARES

Applicable to: Zone 1 – Bridgnorth; Zone 2 – North Shropshire; Zone 3 – Oswestry;
Zone 4 – Shrewsbury & Atcham; Zone 5 - Ludlow

Tariff 1

(From 07.00 hrs to 23.00 hrs Mon - Sat)

Flag & First Mile (1,760 yards (1,609 metres))	£4.00
For each 176 yards or uncompleted part thereof (equivalent to £1.50 per mile)	£0.15
Waiting time (equivalent to £18 per hour)	£0.15 per 30 sec

Tariff 2

(23.00 to 07.00 hrs including all day Sunday and Bank Holidays
with the exception of those listed below)

Flag & First Mile (1,760 yards (1,609 metres))	£6.00
For each 176 yards or uncompleted part thereof (equivalent to £2.50 per mile)	£0.25
Waiting time (equivalent to £30 per hour)	£0.25 per 30 sec

Tariff 3

(From 00.01 hrs to 24.00 hrs on Easter Sunday, Christmas Eve,
Christmas Day, New Year's Eve and New Year's Day)

Flag & First Mile (1,760 yards (1,609 metres))	£6.60
For each 176 yards or uncompleted part thereof (equivalent to £3.00 per mile)	£0.30
Waiting time (equivalent to £36 per hour)	£0.30 per 30 sec

Tariff 4

Optional tariff for minibus or larger vehicles where 5 or
more passengers are carried.

Flag & First Mile (1,760 yards (1,609 metres))	£7.50
For each 176 yards or uncompleted part thereof (equivalent to £3.00 per mile)	£0.30
Waiting time (equivalent to £36 per hour)	£0.30 per 30 sec

Extra Charges

Soiling charge	£100.00
----------------	---------

All of the above fees are inclusive of VAT where applicable.
Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND.
Tel: 0345 678 9026

Email: Licensing@shropshire.gov.uk

Mandy Beever

From: Mandy Beever
Sent: 18 October 2013 13:51
To: : Paul McCreary
Cc: Steve Charmley; Peter M Adams; Vernon Bushell; Joyce Barrow; Peter Cherrington; Steve Davenport; Andrew B Davies; Nigel Hartin; Keith Roberts; Richard Huffer; Roger Hughes; Robert Macey; Jon Tandy; Rosanna Taylor-Smith; Robert Tindall;
Subject: RE: Proposed chargeable fees

Good Afternoon .

This email is to confirm that your email has been received.

Please note my change of telephone number below.

Kind Regards

Mandy

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 251702
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

From:
Sent: 18 October 2013 13:01
To: Paul McCreary
Cc: Steve Charmley; Peter M Adams; Vernon Bushell; Joyce Barrow; Peter Cherrington; Steve Davenport; Andrew B Davies; Nigel Hartin; Keith Roberts; Richard Huffer; Roger Hughes; Robert Macey; Jon Tandy; Rosanna Taylor-Smith; Robert Tindall; Mandy Beever;
Subject: Proposed chargeable fees

Dear Paul McCreary.

Ref: Proposed chargeable fees

- 1) What is a hackney carriage proprietors licence? as published in "Shropshire Councils statutory proposed local Government (miscellaneous Act 1976 Section 53 & 70 dated 30th Sept 2013 fees & modifications .
- 2) Why is the proposed charge for new P/H vehicle licence more expensive than a hackney vehicle (purposed HC £150.00 / PH £160.00).
- 3) Why is the proposed H/C -P/H renewal more expensive than new application..?
- 4) Why is the proposed increase for the 240 mm x 180 mm perspex exterior licence plate (£13.00) cheaper than the laminated 150 mm x 120mm interior licence plate. (£15.00) ? (*See Attached*)
- 5) Why does the printed fare card cost £9.00 when local stationers can produce it for less than 9p and why is it not possible to down load from Shropshire Councils web site ? . (*see Attached*)
- 6) Why has the operators licence for fewer than 5 vehicles been reduced and operators with over 200 vehicles increase from £165-00 to £2,551.00.
- 7) What is the additional administrative charges (licence holder transfer / change of details of £10 referring to ?
- 8) How much has the online licence application cost to set up and how much will be saved by this procedure ?.
- 9) Does the proposed fee for a drivers badge include the crb baring and the D.V.L.A. fees. (can you make this clear in your papers.

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.

Mandy Beever

From: Frances Darling
Sent: 25 October 2013 15:18
To:
Cc: Mandy Beever
Subject: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear

Further to your email of 18 October, please find responses to your questions detailed below:-

1. A "hackney carriage proprietors licence" is a hackney carriage vehicle licence as referred to in the relevant sections of Part II of the Local Government (Miscellaneous Provisions) Act 1976. I apologise for any confusion our terminology may have caused.
2. The difference in the proposed fees for a new private hire vehicle and a new hackney carriage vehicle licence is due to the fact that the private hire vehicle licence fee includes the cost of a pair of side door plates; these plates are not required for hackney carriages.
3. The renewal fees for private hire and hackney carriage licences are marginally more expensive than the new licence fees because the renewal process actually involves everything that the new licence process involves AND the additional costs associated with issuing the reminder paperwork.
4. The costs of the replacement exterior and interior plates are made up of the officer time to record the request and to produce the plates, together with the direct costs that the authority is charged for the actual items that make up the plates. The officer time is the same for each type of plate but the cost of the items for the plates differs. For the exterior plates, the authority is charged £4.70 for a pre-printed template, plastic outer cover and label and for the interior plates the charge is £4.94 for a pre-printed template with glow in the dark backing and label. It is the glow in the dark backing that increases the cost.
5. a) The proposed cost of producing the table of fares card has been calculated from officer time to record the request and the time to produce the card, together with the direct costs that the authority is charged by the printers. The actual printing/laminating cost per card to the authority is £0.24. On reflection, we have built in the cost of producing the card twice, i.e. by the authority and the printers, when in fact the production of the card is undertaken by external printers. On this basis, I will be proposing to the Licensing & Safety Sub-Committee that this particular fee is reduced to

£2.50/card. (This may actually be even less as I am currently in the process of checking additional legal requirements under the Local Government Act 1972 that may require the authority to further reduce this particular fee.)

5. b) With respect to making the card details available to download from the Council's website, I can see no reason why we would not do this and will make this recommendation to the Sub-Committee. The only practical issue I foresee for drivers is that clearly the card would not be laminated if downloaded in this way. Whilst it is not essential that it is laminated, this does prevent the card from becoming damaged/defaced and I would recommend drivers arrange this separately if they were to choose the download option.

6. The private hire operator fees were considered in detail with the over-riding principle being that those operators who have a greater impact on the licensing service ought to pay more than those who impact less. The actual basic cost of processing an operator's licence is the same for any operator irrespective of the number of vehicles they operate and hence the minimum fee for up to 5 vehicles has been calculated at £86 and £118 for 1 year and 3 years respectively. This includes an amount to cover enforcement of the private hire regime in terms of compliance checks on licensed vehicles but also reflecting the position of a significantly smaller number of vehicles that require these checks. The increasing scale of fees for larger operators is based on adding additional officer time per vehicle to carry out a greater number of compliance checks and to deal with the additional level of work that is generated as a result of the larger number of vehicles involved. A formula based approach has been adopted to work out the specific fees and averages have been used where necessary with the aim of making the fees as fair as possible to all operators without creating unhelpful bureaucracy in the process.

7. The license holder transfer/change of details fee of £10 relates to very minor changes that would be made on the licensing database and would not involve significant officer time or materials. In effect, they are examples of administrative changes that do not involve officers undertaking checks or producing paperwork/plates, etc. It is not envisaged that these types of administrative changes will be a regular occurrence; however, we wanted to ensure they were catered for in the event that such changes are required.

8. With respect to what you refer to as the "online licence application", we are currently embarking on a project to introduce an online application and payment process for all licences, but this is not in place as yet.

9. The drivers' joint badge fees do include the Disclosure and Barring Service (DBS) check, which was previously the CRB check, and also the DVLA fee. For the 1 year badge, it also includes the first knowledge test and the first driver training assessment. I will ensure this is made clear in any future papers, in particular when the fees are finalised by the Sub-Committee.

I trust that the above information clarifies the position in respect of each of the questions you raised. If not, please do not hesitate to contact me. I would remind you that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Yours sincerely
Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection

Email: frances.darling@shropshire.gov.uk

Tel: 01743 251715

Mobile: 0758 200 4868

Fax: 01743 254114

Web: www.shropshire.gov.uk

Mandy Beever

From:
Sent: 26 October 2013 15:22
To: Frances Darling; Mandy Beever; Paul McGréary
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Frances Darling,
Thank you for answering the points previously made.
Can you just clarify these remaining issues .

- 1) Can you amend the papers to state that "Private Hire door signs are included in the cost & the Private hire.
& that the door signs @ £16-00 per pair are for replacement following loss or damage ?.
- 2) Are you sure that a reminder letter for existing licenced vehicles costs £7.00 to send out ? . as all associated papers are available to down load from Shropshire Councils web site.
- 3) The table of fare card is **NOT** supplied to drivers by Shropshire council laminated ? . the interior licence plate **does not contain** at present or approved hologram as previously prescribed and are not being issued with glow in the dark backing , can you find out why?
- 4) can you explain what type of licence transfer you are referring to, is it vehicle or operator ?
- 5) How much has been spent on the online application provision and how much money will be saved by drivers and operators. Will this provision be available within the next financial period.
- 6) You state that compliance check of private hire vehicles is paid for by private hire operators ,how is compliance of hackney vehicles paid for.

yours faithfully

E-mail Disclaimer :

*This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.
Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended*

to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.

From: frances.darling@shropshire.gov.uk

To:

CC: mandy.beever@shropshire.gov.uk

Subject: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Date: Fri, 25 Oct 2013 14:17:52 +0000

Dear

Further to your email of 18 October, please find responses to your questions detailed below:-

1. A "hackney carriage proprietors licence" is a hackney carriage vehicle licence as referred to in the relevant sections of Part II of the Local Government (Miscellaneous Provisions) Act 1976. I apologise for any confusion our terminology may have caused.
2. The difference in the proposed fees for a new private hire vehicle and a new hackney carriage vehicle licence is due to the fact that the private hire vehicle licence fee includes the cost of a pair of side door plates; these plates are not required for hackney carriages.
3. The renewal fees for private hire and hackney carriage licences are marginally more expensive than the new licence fees because the renewal process actually involves everything that the new licence process involves AND the additional costs associated with issuing the reminder paperwork.
4. The costs of the replacement exterior and interior plates are made up of the officer time to record the request and to produce the plates, together with the direct costs that the authority is charged for the actual items that make up the plates. The officer time is the same for each type of plate but the cost of the items for the plates differs. For the exterior plates, the authority is charged £4.70 for a pre-printed template, plastic outer cover and label and for the interior plates the charge is £4.94 for a pre-printed template with glow in the dark backing and label. It is the glow in the dark backing that increases the cost.

5. a) The proposed cost of producing the table of fares card has been calculated from officer time to record the request and the time to produce the card, together with the direct costs that the authority is charged by the printers. The actual printing/laminating cost per card to the authority is £0.24. On reflection, we have built in the cost of producing the card twice, i.e. by the authority and the printers, when in fact the production of the card is undertaken by external printers. On this basis, I will be proposing to the Licensing & Safety Sub-Committee that this particular fee is reduced to £2.50/card. (This may actually be even less as I am currently in the process of checking additional legal requirements under the Local Government Act 1972 that may require the authority to further reduce this particular fee.)

5. b) With respect to making the card details available to download from the Council's website, I can see no reason why we would not do this and will make this recommendation to the Sub-Committee. The only practical issue I foresee for drivers is that clearly the card would not be laminated if downloaded in this way. Whilst it is not essential that it is laminated, this does prevent the card from becoming damaged/defaced and I would recommend drivers arrange this separately if they were to choose the download option.

6. The private hire operator fees were considered in detail with the over-riding principle being that those operators who have a greater impact on the licensing service ought to pay more than those who impact less. The actual basic cost of processing an operator's licence is the same for any operator irrespective of the number of vehicles they operate and hence the minimum fee for up to 5 vehicles has been calculated at £86 and £118 for 1 year and 3 years respectively. This includes an amount to cover enforcement of the private hire regime in terms of compliance checks on licensed vehicles but also reflecting the position of a significantly smaller number of vehicles that require these checks. The increasing scale of fees for larger operators is based on adding additional officer time per vehicle to carry out a greater number of compliance checks and to deal with the additional level of work that is generated as a result of the larger number of vehicles involved. A formula based approach has been adopted to work out the specific fees and averages have been used where necessary with the aim of making the fees as fair as possible to all operators without creating unhelpful bureaucracy in the process.

7. The license holder transfer/change of details fee of £10 relates to very minor changes that would be made on the licensing database and would not involve significant officer time or materials. In effect, they are examples of administrative changes that do not involve officers undertaking checks or producing paperwork/plates, etc. It is not envisaged that these types of administrative changes will be a regular occurrence; however, we wanted to ensure they were catered for in the event that such changes are required.

8. With respect to what you refer to as the "online licence application", we are currently embarking on a project to introduce an online application and payment process for all licences, but this is not in place as yet.

9. The drivers' joint badge fees do include the Disclosure and Barring Service (DBS) check, which was previously the CRB check, and also the DVLA fee. For the 1 year badge, it also includes the first knowledge test and the first driver training assessment. I will ensure this is made clear in any future papers, in particular when the fees are finalised by the Sub-Committee.

I trust that the above information clarifies the position in respect of each of the questions you raised. If not, please do not hesitate to contact me. I would remind you that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Yours sincerely
Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection

Email: frances.darling@shropshire.gov.uk

Tel: 01743 251715

Mobile: 0758 200 4868

Fax: 01743 254114

Web: www.shropshire.gov.uk

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

Mandy Beever

From: Mandy Beever
Sent: 28 October 2013 15:42
To:
Cc: Frances Darling; Paul McGreary
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Good Afternoon :

I am responding to your questions due to the fact that Frances is on leave until the 5th of November 2013, I can confirm the following:-

1. I will remind Frances to amend the papers to include the cost of the Private Hire Door signs as requested along with the cost of the replacement door signs. Please note the replacement door signs fee propose is £15.00 and not the £16.00 as you have quoted.
2. The cost of the reminder letter is made up of officer time to run the reports to extract the data which confirms whose licence is due to expire, checking this data, processing of the paperwork, packing the letters, postage, paper, printing and envelopes. I accept that all associated papers are available on the website but the cost is for the reminder process (as above) in addition to the paperwork.
3. The Table of Fares card was supplied to drivers previously laminated and is now supplied to drivers with a plastic coating equivalent to laminating in order to prolong the life of the card. In regard to your comment about the hologram I accept that there have been some plates issued without the reflective 'glow in the dark' background and hologram this was an error made by our suppliers in a batch of plates they supplied and unfortunately was not picked up straight away by the officers. However this has now been corrected and plates are currently being issued correctly.
4. I have read Frances' previous response and can only conclude that your question 4 refers to Frances' question 7 response. In which she is referring to the changing of name and address details, this could be for an Operator or Vehicle where no plates or badges are required to be printed and therefore is an administrative charged based on receiving the request for a change of details, attaching the documentation to the account, checking the request and updating the system details.
5. I am unable to provide you with an exact cost for the online application provision at this time, it is part of a larger project for all licences not just for operators and drivers. However, all costs will be kept to a minimum and where possible existing resources will be utilised to deliver on this project. It is envisaged that this provision will be available within the next financial year.
6. You will note that the Hackney Carriage Licence fees have increased this revised figure takes into account the cost of compliance checks of Hackney Carriages.

I hope the above information clarifies the questions you have raised. If not, please do not hesitate to contact me. Please be reminded that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Kind Regards

Mandy

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury

Shropshire
SY2 6ND

Tel: 01743 251702
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

From:

Sent: 26 October 2013 15:22

To: Frances Darling; Mandy Beever; Paul McGreary

Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Frances Darling.

Thank you for answering the points previously made.
Can you just clarify these remaining issues .

- 1) Can you amend the papers to state that "Private Hire door signs are included in the cost & the Private hire.
& that the door signs @ £16-00 per pair are for replacement following loss or damage ?.
- 2) Are you sure that a reminder letter for existing licenced vehicles costs £7.00 to send out ? . as all associated papers are available to down load from Shropshire Councils web site.
- 3) The table of fare card is **NOT** supplied to drivers by Shropshire council laminated ? .
the interior licence plate **does not contain** at present or approved hologram as previously prescribed and are not being issued with glow in the dark backing , can you find out why?
- 4) can you explain what type of licence transfer you are referring to, is it vehicle or operator ?
- 5) How much has been spent on the online application provision and how much money will be saved by drivers and operators. Will this provision be available within the next financial period.
- 6) You state that compliance check of private hire vehicles is paid for by private hire operators ,how is compliance of hackney vehicles paid for.

yours faithfully

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.

From: frances.darling@shropshire.gov.uk

To:

CC: mandy.beever@shropshire.gov.uk

Subject: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Date: Fri, 25 Oct 2013 14:17:52 +0000

Dear

Further to your email of 18 October, please find responses to your questions detailed below:-

1. A "hackney carriage proprietors licence" is a hackney carriage vehicle licence as referred to in the relevant sections of Part II of the Local Government (Miscellaneous Provisions) Act 1976. I apologise for any confusion our terminology may have caused.
2. The difference in the proposed fees for a new private hire vehicle and a new hackney carriage vehicle licence is due to the fact that the private hire vehicle licence fee includes the cost of a pair of side door plates; these plates are not required for hackney carriages.
3. The renewal fees for private hire and hackney carriage licences are marginally more expensive than the new licence fees because the renewal process actually involves everything that the new licence process involves AND the additional costs associated with issuing the reminder paperwork.
4. The costs of the replacement exterior and interior plates are made up of the officer time to record the request and to produce the plates, together with the direct costs that the authority is charged for the actual items that make up the plates. The officer time is the same for each type of plate but the cost of the items for the plates differs. For the exterior plates, the authority is charged £4.70 for a pre-printed template, plastic outer cover and

label and for the interior plates the charge is £4.94 for a pre-printed template with glow in the dark backing and label. It is the glow in the dark backing that increases the cost.

5. a) The proposed cost of producing the table of fares card has been calculated from officer time to record the request and the time to produce the card, together with the direct costs that the authority is charged by the printers. The actual printing/laminating cost per card to the authority is £0.24. On reflection, we have built in the cost of producing the card twice, i.e. by the authority and the printers, when in fact the production of the card is undertaken by external printers. On this basis, I will be proposing to the Licensing & Safety Sub-Committee that this particular fee is reduced to £2.50/card. (This may actually be even less as I am currently in the process of checking additional legal requirements under the Local Government Act 1972 that may require the authority to further reduce this particular fee.)

5. b) With respect to making the card details available to download from the Council's website, I can see no reason why we would not do this and will make this recommendation to the Sub-Committee. The only practical issue I foresee for drivers is that clearly the card would not be laminated if downloaded in this way. Whilst it is not essential that it is laminated, this does prevent the card from becoming damaged/defaced and I would recommend drivers arrange this separately if they were to choose the download option.

6. The private hire operator fees were considered in detail with the over-riding principle being that those operators who have a greater impact on the licensing service ought to pay more than those who impact less. The actual basic cost of processing an operator's licence is the same for any operator irrespective of the number of vehicles they operate and hence the minimum fee for up to 5 vehicles has been calculated at £86 and £118 for 1 year and 3 years respectively. This includes an amount to cover enforcement of the private hire regime in terms of compliance checks on licensed vehicles but also reflecting the position of a significantly smaller number of vehicles that require these checks. The increasing scale of fees for larger operators is based on adding additional officer time per vehicle to carry out a greater number of compliance checks and to deal with the additional level of work that is generated as a result of the larger number of vehicles involved. A formula based approach has been adopted to work out the specific fees and averages have been used where necessary with the aim of making the fees as fair as possible to all operators without creating unhelpful bureaucracy in the process.

7. The license holder transfer/change of details fee of £10 relates to very minor changes that would be made on the licensing database and would not involve significant officer time or materials. In effect, they are examples of administrative changes that do not involve officers undertaking checks or producing paperwork/plates, etc. It is not envisaged that these types of administrative changes will be a regular occurrence; however, we wanted to ensure they were catered for in the event that such changes are required.

8. With respect to what you refer to as the "online licence application", we are currently embarking on a project to introduce an online application and payment process for all licences, but this is not in place as yet.

9. The drivers' joint badge fees do include the Disclosure and Barring Service (DBS) check, which was previously the CRB check, and also the DVLA fee. For the 1 year badge, it also includes the first knowledge test and the first driver training assessment. I will ensure this is made clear in any future papers, in particular when the fees are finalised by the Sub-Committee.

I trust that the above information clarifies the position in respect of each of the questions you raised. If not, please do not hesitate to contact me. I would remind you that the deadline for objections, in respect of the proposed variation to the fees, is **noon on the 30 October 2013**.

Yours sincerely
Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection

Email: frances.darling@shropshire.gov.uk

Tel: 01743 251715

Mobile: 0758 200 4868

Fax: 01743 254114

Web: www.shropshire.gov.uk

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

Mandy Beever

From:
Sent: 28 October 2013 10:07
To: Frances Darling; Paul McGreary; Mandy Beever
Subject: Internal licence plate
Attachments: internal licence.tif

Dear Frances Darling. (Please see attached)

The internal licence plate on the left is the design that has been used since 2011 it does not include the prescribed hologram or the glow in the dark properties,

The sign on the right is compliant and does include the hologram and the glow in the dark panel (issued 05-09-2010.

I hope this helps with your revised costing's.

yours faithfully

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in

error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.



Shropshire
Council

**HACKNEY
CARRIAGE**

REGISTRATION NO:

VEHICLE TYPE:

EXPIRY DATE:

NUMBER OF PASSENGERS:

[Redacted]

[Redacted]

05/09/2010

4 PASSENGERS

THIS PLATE BELONGS TO SHROPSHIRE COUNCIL

MOOD



Shropshire
Council

**HACKNEY
CARRIAGE**

REGISTRATION NO:

VEHICLE TYPE:

EXPIRY DATE:

NUMBER OF PASSENGERS:

[Redacted]

[Redacted]

22/08/2014

4 PASSENGERS

THIS PLATE BELONGS TO SHROPSHIRE COUNCIL

MOOD

Mandy Beever

From: Mandy Beever
Sent: 29 October 2013 11:14
To:
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Good Morning

Please can you send me your 'other anomalies' in regard to the Fees and Charges and I will try to get a response to you today if I can.

The other items below I will respond to separately.

Hope this helps?

Kind Regards

Mandy.

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 251702
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

From:
Sent: 29 October 2013 10:50
To: Mandy Beever
Cc: Frances Darling; Paul McGreary
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Mandy Beever .

Thank you for responding to me on behalf of Francis Darling.
We have come across quite a few more anomalies within the documents relating to costing's
Do you want me to send you details of these, although I may not receive the information before we lodge a formal objection before the deadline.
Can I trust that the anomalies will be corrected before the final papers are presented to the committee, even with my poor CSE maths qualification I can see that the figures just don't add up.
Do you intend to supply the correct prescribed internal licence plate to drivers who have received the

incomplete signs, as all of the drivers I have spoken to have the wrong licence displayed ?.
Surly your fleet compliance checks should of spotted the none compliant vehicles.

I have seen this week that not one of the _____ operating from the _____ are
displaying the door signs or drivers wearing badges .
Who was responsible for checking this operator was compliant ?

yours faithfully

E-mail Disclaimer :

***This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.
Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.
If you have received this e-mail in error please notify the Author.***

From: mandy.beever@shropshire.gov.uk

To:

CC: frances.darling@shropshire.gov.uk; paul.mcgreary@shropshire.gov.uk

Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Date: Mon, 28 Oct 2013 15:42:14 +0000

Good Afternoon

I am responding to your questions due to the fact that Frances is on leave until the 5th of November 2013, I can confirm the following:-

I will remind Frances to amend the papers to include the cost of the Private Hire Door signs as requested along with the cost of the replacement door signs. Please note the replacement door signs fee propose is £15.00 and not the £16.00 as you have quoted.

2. The cost of the reminder letter is made up of officer time to run the reports to extract the data which confirms whose licence is due to expire, checking this data, processing of the paperwork, packing the letters, postage, paper, printing and envelopes. I accept that all associated papers are available on the website but the cost is for the reminder process (as above) in addition to the paperwork.
3. The Table of Fares card was supplied to drivers previously laminated and is now supplied to drivers with a plastic coating equivalent to laminating in order to prolong the life of the card. In regard to your comment about the hologram I accept that there have been some plates issued without the reflective 'glow in the dark' background and hologram this was an error made by our suppliers in a batch of plates they supplied and unfortunately was not picked up straight away by the officers. However this has now been corrected and plates are currently being issued correctly.
4. I have read Frances' previous response and can only conclude that your question 4 refers to Frances' question 7 response. In which she is referring to the changing of name and address details, this could be for an Operator or Vehicle where no plates or badges are required to be printed and therefore is an administrative charge based on receiving the request for a change of details, attaching the documentation to the account, checking the request and updating the system details.
5. I am unable to provide you with an exact cost for the online application provision at this time, it is part of a larger project for all licences not just for operators and drivers. However, all costs will be kept to a minimum and where possible existing resources will be utilised to deliver on this project. It is envisaged that this provision will be available within the next financial year.
6. You will note that the Hackney Carriage Licence fees have increased this revised figure takes into account the cost of compliance checks of Hackney Carriages.

I hope the above information clarifies the questions you have raised. If not, please do not hesitate to contact me. Please be reminded that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Kind Regards

Mandy

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 251702
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

From: I
Sent: 26 October 2013 15:22
To: Frances Darling; Mandy Beever; Paul McGreary
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Frances Darling,
Thank you for answering the points previously made.
Can you just clarify these remaining issues .

- 1) Can you amend the papers to state that "Private Hire door signs are included in the cost & the Private hire.
& that the door signs @ £16-00 per pair are for replacement following loss or damage ?.
- 2) Are you sure that a reminder letter for existing licenced vehicles costs £7.00 to send out ?. as all associated papers are available to down load from Shropshire Councils web site.
- 3) The table of fare card is **NOT** supplied to drivers by Shropshire council laminated ?.
the interior licence plate does not contain at present or approved hologram as previously prescribed and are not being issued with glow in the dark backing , can you find out why?
- 4) can you explain what type of licence transfer you are referring to, is it vehicle or operator ?
- 5) How much has been spent on the online application provision and how much money will be saved by drivers and operators. Will this provision be available within the next financial period.
- 6) You state that compliance check of private hire vehicles is paid for by private hire operators ,how is compliance of hackney vehicles paid for.

yours faithfully

E-mail Disclaimer :

*This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.
Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.
If you have received this e-mail in error please notify the Author.*

From: frances.darling@shropshire.gov.uk

To:

CC: mandy.beever@shropshire.gov.uk

Subject: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Date: Fri, 25 Oct 2013 14:17:52 +0000

Dear

Further to your email of 18 October, please find responses to your questions detailed below:-

1. A "hackney carriage proprietors licence" is a hackney carriage vehicle licence as referred to in the relevant sections of Part II of the Local Government (Miscellaneous Provisions) Act 1976. I apologise for any confusion our terminology may have caused.
2. The difference in the proposed fees for a new private hire vehicle and a new hackney carriage vehicle licence is due to the fact that the private hire vehicle licence fee includes the cost of a pair of side door plates; these plates are not required for hackney carriages.
3. The renewal fees for private hire and hackney carriage licences are marginally more expensive than the new licence fees because the renewal process actually involves everything that the new licence process involves AND the additional costs associated with issuing the reminder paperwork.
4. The costs of the replacement exterior and interior plates are made up of the officer time to record the request and to produce the plates, together with the direct costs that the authority is charged for the actual items that make up the plates. The officer time is the same for each type of plate but the cost of the items for the plates differs. For the exterior plates, the authority is charged £4.70 for a pre-printed template, plastic outer cover and label and for the interior plates the charge is £4.94 for a pre-printed template with glow in the dark backing and label. It is the glow in the dark backing that increases the cost.
5. a) The proposed cost of producing the table of fares card has been calculated from officer time to record the request and the time to produce the card, together with the direct costs that the authority is charged by the printers. The actual printing/laminating cost per card to the authority is £0.24. On reflection, we have built in the cost of producing the card twice, i.e. by the authority and the printers, when in fact the production of the card is undertaken by external printers. On this basis, I will be proposing to the Licensing & Safety Sub-Committee that this particular fee is reduced to £2.50/card. (This may actually be even less as I am currently in the process of checking additional legal requirements under the Local Government Act 1972 that may require the authority to further reduce this particular fee.)

5. b) With respect to making the card details available to download from the Council's website, I can see no reason why we would not do this and will make this recommendation to the Sub-Committee. The only practical issue I foresee for drivers is that clearly the card would not be laminated if downloaded in this way. Whilst it is not essential that it is laminated, this does prevent the card from becoming damaged/defaced and I would recommend drivers arrange this separately if they were to choose the download option.

6. The private hire operator fees were considered in detail with the over-riding principle being that those operators who have a greater impact on the licensing service ought to pay more than those who impact less. The actual basic cost of processing an operator's licence is the same for any operator irrespective of the number of vehicles they operate and hence the minimum fee for up to 5 vehicles has been calculated at £86 and £118 for 1 year and 3 years respectively. This includes an amount to cover enforcement of the private hire regime in terms of compliance checks on licensed vehicles but also reflecting the position of a significantly smaller number of vehicles that require these checks. The increasing scale of fees for larger operators is based on adding additional officer time per vehicle to carry out a greater number of compliance checks and to deal with the additional level of work that is generated as a result of the larger number of vehicles involved. A formula based approach has been adopted to work out the specific fees and averages have been used where necessary with the aim of making the fees as fair as possible to all operators without creating unhelpful bureaucracy in the process.

7. The license holder transfer/change of details fee of £10 relates to very minor changes that would be made on the licensing database and would not involve significant officer time or materials. In effect, they are examples of administrative changes that do not involve officers undertaking checks or producing paperwork/plates, etc. It is not envisaged that these types of administrative changes will be a regular occurrence; however, we wanted to ensure they were catered for in the event that such changes are required.

8. With respect to what you refer to as the "online licence application", we are currently embarking on a project to introduce an online application and payment process for all licences, but this is not in place as yet.

9. The drivers' joint badge fees do include the Disclosure and Barring Service (DBS) check, which was previously the CRB check, and also the DVLA fee. For the 1 year badge, it also includes the first knowledge test and the first driver training assessment. I will ensure this is made clear in any future papers, in particular when the fees are finalised by the Sub-Committee.

I trust that the above information clarifies the position in respect of each of the questions you raised. If not, please do not hesitate to contact me. I would remind you that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Yours sincerely
Frances Darling
Service Manager – Safer & Stronger Communities.
Public Protection

Email: frances.darling@shropshire.gov.uk

Tel: 01743 251715

Mobile: 0758 200 4868

Fax: 01743 254114

Web: www.shropshire.gov.uk

If you are not the intended recipient of this email please do not send it on
to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

If you are not the intended recipient of this email please do not send it on
to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

Mandy Beever

From:
Sent: 29 October 2013 07:28
To: Licensing
Cc: Mandy Beever; Frances Darling; James Walton; grant.b.patterson@uk.gt.com
Subject: Shropshire Council - Taxi Licensing Fees - Objection
Attachments: 2013.10.29 Letter (Fee Objection) to Shropshire Council.pdf

Dear Sir / Madam,

With regards to the above matter, please find attached letter of objection on behalf of my clients,

Please kindly acknowledge safe receipt and, in due course, advise of the date, time and venue of the Meeting of the Licensing and Safety Sub-committee at which objections to the fee proposal are to be considered.

This email and the attached letter have also been copied to Mr James Walton, the Council's Section 151 Officer and Head of Finance, Governance and Assurance; and District Auditor, Mr Grant P Patterson of Grant Thornton, because the issues raised will be pursued as a formal objection to the Annual Accounts of Council, if not voluntarily addressed by the Council to my clients' satisfaction in the meantime.

Yours faithfully,

Licensing
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Our Ref:
Your Ref:
Date: 29 October 2013
Please ask for:

By First Class post and email to:
licensing@shropshire.gov.uk

Dear Sir / Madam,

**Local Government (Miscellaneous Provisions) Act 1976, sections 53 and 70
Hackney Carriage Proprietor's Licence and Hackney Carriage Driver's Licence Fees
for zones 1, 2, 3, 4 and 5**

**Private Hire Vehicle Licence, Private Hire Operator's Licence, Private Hire Vehicle
Driver's Licence Fees**

Objection by

I act on behalf of _____ the two
largest private hire companies in the county.

Please accept this letter as their joint objection to the proposal to increase various fees relating to hackney carriage and / or private hire licensing and advance notice of their intention to make formal objections to the District Auditor in relation to the annual accounts of Council for the current financial year.

Before challenging the Council to prove that its five district council predecessors adopted Part II of the Local Government (Miscellaneous Provisions) Act 1976, under which the Council charges hackney carriage and private hire licensing fees (and seeks to further increase those fees), I should wish to draw Members' attention to the three substantial matters which, for the sake of clarity, I shall address under separate headings.

Financial Analysis

In paragraph 4.5 of her report to the Meeting of the Strategic Licensing Committee on 25 September 2013, Mrs Frances Darling set out the following in relation to financial implications:

- 4.5 Each category of licence fee has been considered separately. However, the total recoverable licensing costs for 2013/14 are estimated to be £734,657. Whilst this is the total amount that the 2013/14 fees are aiming to recover, the actual recovery must relate to the separate licence categories. In 2011/12 licensing income was £726,043; this fell to £673,059 in 2012/13. The reduction in income is partly as a result of the decrease in the number of out of area hackney carriage and driver licence applications that are now being processed; however, it also due to the Council's fees not being set at a level sufficient to recover the costs that can legally be recovered.

Regrettably, nowhere in her aforementioned report does Mrs Darling remind Members of the in-year surplus that was accrued in 2011 / 2012, which cleared an existing £60,000 deficit. In this regard, I respectfully refer you to the Minutes of the Meeting of the Strategic Licensing Committee of 21 March 2012 at which, at paragraphs 43.3 and 43.4, the following is formally minuted:

- 43.3 Mr P. Adams, Chairman of the Licensing and Safety Sub-Committee, thanked officers that had been involved with the recent additional meetings of the Licensing and Safety Sub-Committee. He added that the extra income generated by the increase in licensing applications had eliminated a £60,000 deficit. It was suggested that a press release be prepared in relation to the good news.
- 43.4 The Chairman along with other Members of the Committee added their thanks to all officers involved.

The total licensing revenue of £726,043 that Mrs Darling reports was recovered in 2011 / 2012 was not only sufficient to cover that year's costs, but also, as Councillor Peter Adams reported on 21 March 2012, eliminated an existing £60,000 deficit.

In the circumstances, the actual costs of the whole of the licensing service in 2011 / 2012 seems to have been no more than £666,043 (£726,043 less £60,000).

Somewhat perversely, albeit acting on the very clear advice of officers, Strategic Licensing Committee resolved on 21 March 2012 (at the same meeting at which the elimination of the existing £60,000 deficit was reported) to increase hackney carriage and private hire licensing fees from midnight on 31 March 2012.

As a result of that (and presumably other licensing fee increases), the total estimated licensing fee revenue for 2013 / 2014 is intended to recover the costs of the service, which Mrs Darling estimates at £734,657.

If the service costs had increased, such increases in fees may have been necessary and appropriate, but from paragraph 5.2 of her aforementioned report, it would appear that the costs of the service will have been reduced. In her aforementioned report, Mrs Darling advised Members of the work that has been done "to re-design

processes to make them as lean and effective as possible to keep costs to a minimum”:

- 5.2 ... Further work was also required to be undertaken to re-design processes to make them as lean and effective as possible to keep costs to a minimum. This work was carried out in early 2013 with new leaner processes implemented from June 2013.

On the face of it, it appears that the fees charged in 2011 / 2012 generated at least £60,000 more than was required to cover the costs of hackney carriage and private hire licensing, but in spite of this, with effect from midnight on 31 March 2012, the Council increased the fees and implemented new leaner processes in June 2013 to keep costs to a minimum.

Not only are those processes leaner, but so is the licensing team, having already suffered a number of staff redundancies and a further three redundancies planned to be made by the end of the current year. Despite these improvements and costs saving, it appears Mrs Darling is suggesting that the costs of the service in 2013 / 2014 are £68,614 more than they were on 2011 / 2012.

With the very greatest of respect, it is preposterous to propose an increase in fees when the various minutes and reports clearly show that hackney carriage and private hire licensing fee revenue exceeded costs in 2011 / 2012 by at least £60,000 and that since that time, fees have been increased and savings made, which must mean the licensing service will accrue a surplus of at least £68,614 (£734,657 recoverable licensing costs for 2013/14 less the assumed cost of the service in 2011 / 2012 of £666,043) in the current financial year.

As it is unlawful for a Council to set licensing fees at a level intended to return a profit, I trust the Council will resolve not to proceed to implement any increase in relation to hackney carriage and private hire licensing fees and to undertake a detailed review of the costs of each of the five licence types, presuming it is able to establish that each of its five district council predecessors did adopt Part II of the Local Government (miscellaneous Provisions) Act 1976 throughout the whole of their respective areas, which now together form the controlled district of Shropshire Council.

Individual Licence Fees

With regards to the individual licence fees, I have had the benefit of seeing the objection of _____ Association and its requests for further information and Mrs Darling's response.

In addition to those matters, on behalf of my clients, I should also wish to raise the following matters:

Driver Licensing

Section 53 of the 1976 Act only permits a council to charge a fee for "the grant ... of a licence ... such a fee as they consider reasonable with a view to recovering the costs of issue and administration ...". In the circumstances, the costs of monitoring compliance, which is permitted under section 70 in relation to vehicle and operator licensing, does not apply to driver licensing.

In the circumstances, the "additional 0.5 hour of officer time for further compliance checks in each of yrs 2 & 3" would appear not to be recoverable in relation to a three year driver's licence.

However, of even greater concern is the comparative costs in relation to the initial grant of a one year driver's licence and the renewal and grant of a three year's driver's licence.

It is proposed to increase the fee for the initial grant of a one year driver's licence to £204. That fee is said to include the costs in relation to a DVLA check, DBS check, first knowledge test and first driver training assessment. An Enhanced DBS check currently costs £44. A driver's knowledge test re-test costs £77. A driver training assessment costs £30. The precise cost of the DVLA check is unknown, but depending upon how this is conducted, is likely to be in the region of £5 to £10. In the circumstances, the £204 proposed fee includes disbursements of £156 to £161, which means the actual cost of receiving, determining and granting an initial driver licence is only £43 to £48.

In the circumstances, if a driver has not subscribed to the DBS monitoring service, the fee for a renewed three year driver's licence ought not be the proposed fee of £172, but only £97 (licence fee of £43 to £48, the Enhanced DBS check fee of £44 and the DVLA check fee of £5 to £10).

However, unless each driver's knowledge test is undertaken on a one-to-one basis and genuinely takes two or more hours officer time to conduct, it is difficult to appreciate how the current fee of £62 can be justified, let alone the proposed fee of £77.

In the event that driver's knowledge tests are conducted on a one-to-one basis, it is respectfully suggested that such tests should be conducted with groups of applicants at a time, which would lessen the time burden on officers, who could invigilate the tests of 20 to 30 drivers at a time, and reduce the financial burden for applicants. If an applicant wished to take the driver's knowledge test on a different date to that on which a group test was to be administered and / or wished to take the test on a one-to-one basis, that option could be provided at a higher cost.

Vehicle Licensing

The current and proposed fees in relation to vehicle and operator licensing are, at best, confused.

The proposed fee for the initial (new) grant of a private hire vehicle licence is £160. In her email to _____ dated 26 September 2013, Mrs Darling states that the proposed fee includes the cost of providing a pair of side door plates. These are available separately at a cost of £15. In the circumstances, it would appear that the cost of receiving, determining and processing the grant of a new private hire vehicle licence and undertaking compliance checks for the 12 month period of the licence, is £145.

Despite the fact that, when dealing with a new application, officers will have to spend time to input all information into the Council's computerised licensing system, it is proposed to charge more in connection with processing a renewal application, because it is said it costs £7 to send out renewal reminders / renewal application forms.

If the cost is genuinely £7, one has to question how inefficient the process is for generating and sending out such renewal reminders. An efficient renewal process would simplify the renewal process for the licence holder and the Council, which ought to reduce the cost of a private hire vehicle licence renewal. For example, if the application forms were prepopulated (which could be done as almost all relevant information is already held in the Council's computerised licensing system) and bore a unique bar code, the scanning of that could commence the renewal process and select the appropriate vehicle and owner records, which would improve accuracy as well as reducing officer time in processing a renewal application.

The same arguments apply to hackney carriage proprietor (vehicle) licensing, although one would expect the costs for such licences, if anything, to be higher than the fees for private hire vehicles, because the costs of providing and maintaining taxi ranks may be recovered as part of the proprietor licence fee, pursuant to sub-section (2) of section 70 of the said 1976 Act.

With regards to the provision of a hackney carriage fare card, should this not be generated by the Council's computerised licensing system, because in essence, it is only another document. As the computer system holds details of the vehicle and its passenger carrying capacity, as well as the licence, all those details could be incorporated into the fare card and produced at minimal cost, with Mrs Darling reporting that laminating costs the Council only 24p.

Private Hire Operator Licensing

In relation to private hire operator licensing, it appears from Mrs Darling's aforementioned email that she accepts that "the actual basic cost of processing an operator's licence is the same for any operator irrespective of the number of vehicles they operate and hence the minimum fee for up to 5 vehicles has been calculated at £86 and £118 for 1 year and 3 years respectively".

However, rather than proposing that those fees alone should be set, Mrs Darling has proposed a scale of charges based on the number of private hire vehicles operated by a private hire operator.

In her email explanation to Mrs Darling continues: "This includes an amount to cover enforcement of the private hire regime in terms of compliance checks on licensed vehicles but also reflecting the position of a significantly smaller number of vehicles that require these checks. The increasing scale of fees for larger operators is based on adding additional officer time per vehicle to carry out a greater number of compliance checks and to deal with the additional level of work that is generated as a result of the larger number of vehicles involved. A formula based approach has been adopted to work out the specific fees and averages have been used where necessary with the aim of making the fees as fair as possible to all operators without creating unhelpful bureaucracy in the process."

However, the costs of the compliance checking to which Mrs Darling refers is a cost that should not be attributed to private hire operators, who are in effect licensed as booking agents, but the vehicle licence holder (the vehicle owner), whether that vehicle is a hackney carriage or private hire vehicle.

Save for the administrative process of granting a private hire operator's licence, the only contact my clients have had with officers has concerned requests for information relating to drivers. As I have already stated, the Council cannot recover its costs in relation to driver compliance or enforcement.

Adoption – Local Government (Miscellaneous Provisions) Act 1976, Part II

Because Part II of the Local Government (Miscellaneous Provisions) Act 1976 is adoptive, a council cannot exercise the powers it contains, including the power to charge fees for the licences it grants, unless it has complied with the provisions set out overleaf of section 45 of the said Act.

45 Application of Part II.

- (1) The provisions of this Part of this Act, except this section, shall come into force in accordance with the following provisions of this section.
- (2) If the Act of 1847 is in force in the area of a district council, the council may resolve that the provisions of this Part of this Act, other than this section, are to apply to the relevant area; and if the council do so resolve those provisions shall come into force in the relevant area on the day specified in that behalf in the resolution (which must not be before the expiration of the period of one month beginning with the day on which the resolution is passed). In this subsection "the relevant area", in relation to a council, means—
 - (a) if the Act of 1847 is in force throughout the area of the council, that area; and
 - (b) if the Act of 1847 is in force for part only of the area of the council, that part of that area.
- (3) A council shall not pass a resolution in pursuance of the foregoing subsection unless they have—
 - (a) published in two consecutive weeks, in a local newspaper circulating in their area, notice of their intention to pass the resolution; and
 - (b) served a copy of the notice, not later than the date on which it is first published in pursuance of the foregoing paragraph, on the council of each parish or community which would be affected by the resolution or, in the case of such a parish which has no parish council, on the chairman of the parish meeting.
- (4) If after a council has passed a resolution in pursuance of subsection (2) of this section the Act of 1847 comes into force for any part of the area of the council for which it was not in force when the council passed the resolution, the council may pass a resolution in accordance with the foregoing provisions of this section in respect of that part as if that part were included in the relevant area for the purposes of subsection (2) of this section.

As will be appreciated from sub-section (2) above, the 1976 Act can only be adopted in those areas to which hackney carriage licensing applied under the Town Police Clauses Act 1847.

Until 1 January 1987, when hackney carriage licensing was extended throughout England and Wales (excluding London, which is subject to similar, but different legislation) by section 15 of the Transport Act 1985, hackney carriage licensing only applied in the areas that were previously county boroughs or urban districts, unless applied or extended throughout the whole area of a council created as part of local government re-organisation on 1 April 1974 by virtue of the Local Government Act 1972.

Despite the fact that Shropshire Council was created on 1 April 2009 from the merger of Shropshire County Council and the five district councils within the county, in relation to hackney carriage licensing, the position remains as it was prior to unification. It is for that reason that the Council administers hackney carriage licensing in five hackney carriage zones, the areas of which replicate the areas of the former district councils.

However, the district councils were themselves formed from county boroughs, urban districts and rural districts.

The English Non-metropolitan Districts (Definition) Order 1972 (SI 1972 No 2039) defined the areas of the new districts in the areas of non-metropolitan districts. Part 32 of the said Order relates to the County of Salop, now known as Shropshire.

Part 32: County of Salop	
Reference number of district	Area of district by reference to existing administrative areas
(1) Oswestry	In the administrative county of Salop, the rural district of Oswestry.
(2) North Shropshire	In the administrative county of Salop, the rural districts of Market Drayton and North Shropshire.
(3) Shrewsbury and Atcham	In the administrative county of Salop— the borough of Shrewsbury; the rural district of Atcham.

Reference number of district	Area of district by reference to existing administrative areas
(4) The Wrekin / Telford and Wrekin	In the administrative county of Salop— the urban districts of Dawley, Newport, Oakengates and Wellington; the rural district of Wellington; in the rural district of Shifnal, so much of the parish of Shifnal as lies within the designated area of Telford New Town.
(5) South Shropshire	In the administrative county of Salop, the rural districts of Clun and Bishop's Castle and Ludlow.
(6) Bridgnorth	In the administrative county of Salop— the rural district of Bridgnorth; the rural district of Shifnal, except the part in district 4.

As the whole of the area that is now Shropshire Council included only one area to which hackney carriage licensing applied, namely the county borough of Shrewsbury, until the extension of hackney carriage licensing throughout England and Wales (excluding London) on 1 January 1987 by the Transport Act 1985, hackney carriage licensing could only apply in other parts of the county from an earlier date, if resolutions were made by the five district councils under the provisions of the Local Government Act 1972, section 180 and paragraph 25 of Schedule 14 and approved by the Home Secretary.

In the circumstances, the Council is invited to prove the adoption of Part II of the 1976 Act for each of the five former district councils and, if such adoption was before the statutory extension of hackney carriage licensing throughout England and Wales (excluding London) on 1 January 1987, to also prove the application or extension of hackney carriage licensing within the area of that district council under the provisions of the Local Government Act 1972, section 180 and paragraph 25 of Schedule 14.

Having made requests of the Department for Transport and the National Archives in 2010 for information under the Freedom of Information Act 2000, I can advise that no records pre-dating the Department for Transport taking over responsibility for taxi licensing in 1991 exist in relation to the application / extension of hackney carriage licensing under the Local Government Act 1972.

If the Council is unable to prove an adoption of Part II of the 1976 Act and, if necessary, the application / extension of hackney carriage licensing, it is respectfully submitted that the Council would not only be unable to set licensing fees in relation to any such area(s) of the Council, but would also be liable to repay the fees that it has charged to date without lawful authority.

In view of the potentially serious financial and operational consequences for the Council, if it is unable to prove the adoption of Part II of the 1976 Act by the five former district councils, a copy of this letter is also being sent to the District Auditor and Mr James Walton, the Council's Section 151 Officer and Head of Finance, Governance and Assurance, to whom I have previously written on behalf of my clients.

If the Council would like further clarification of any of the matters herein, please do not hesitate to contact me.

In the event that the Council intends to pursue the proposal to increase hackney carriage and private hire licensing fees, despite the foregoing, I respectfully ask that my clients and I be notified of the date on which this matter is to be considered by the Licensing and Safety Sub-committee and that my clients and / or I be permitted to address Members in relation to this matter.

Please acknowledge safe receipt of this letter as the formal objections of
to the Council's proposal to increase the fees it charges in relation to
hackney carriage and private hire licensing.

Yours faithfully,

Mandy Beever

From:
Sent: 29 October 2013 12:44
To: Mandy Beever
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Mandy Beever. I'm not going to have time today to list other anomalies, but they refer to the cost of a 3 year licence compared to a 1 year, & the cost attributed to a operator who may not own a single licenced vehicle. & the costs of the licensing provision for zone 3 . The costs of producing reminders. Are you aware that the councils website has been down for a considerable time and is impacting on me collating relevant information .

Sent from Samsung Mobile

----- Original message -----

From: Mandy Beever <mandy.beever@shropshire.gov.uk>
Date:
To:
Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Good Morning

Please can you send me your 'other anomalies' in regard to the Fees and Charges and I will try to get a response to you today if I can.

The other items below I will respond to separately.

Hope this helps?

Kind Regards

Mandy

Mandy Beever

Team Manager - Operational Community Safety

Public Protection

Shropshire Council

Shirehall

Abbey Foregate

Shrewsbury

Shropshire

SY2 6ND

Tel: 01743 251702

Mobile: 07582 004877

Email: mandy.beever@shropshire.gov.uk

Web: www.shropshire.gov.uk

From:

Sent: 29 October 2013 10:50

To: Mandy Beever

Cc: Frances Darling; Paul McGreary

Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Mandy Beever .

Thank you for responding to me on behalf of Francis Darling.

We have come across quite a few more anomalies within the documents relating to costing's

Do you want me to send you details of these, although I may not receive the information before we lodge a formal objection before the deadline.

Can I trust that the anomalies will be corrected before the final papers are presented to the committee, even with my poor CSE maths qualification I can see that the figures just don't add up.

Do you intend to supply the correct prescribed internal licence plate to drivers who have received the incomplete signs, as all of the drivers I have spoken to have the wrong licence displayed ?.

Surly your fleet compliance checks should of spotted the none compliant vehicles.

I have seen this week that not one of the NSL vehicles operating from the Orthopaedic hospital are displaying the door signs or drivers wearing badges .

Who was responsible for checking this operator was compliant ?

yours faithfully

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in

error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.

From: mandy.beever@shropshire.gov.uk

To:

CC: frances.darling@shropshire.gov.uk; paul.mcgreary@shropshire.gov.uk

Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Date: Mon, 28 Oct 2013 15:42:14 +0000

Good Afternoon

I am responding to your questions due to the fact that Frances is on leave until the 5th of November 2013, I can confirm the following:-

1. I will remind Frances to amend the papers to include the cost of the Private Hire Door signs as requested along with the cost of the replacement door signs. Please note the replacement door signs fee propose is £15.00 and not the £16.00 as you have quoted.
2. The cost of the reminder letter is made up of officer time to run the reports to extract the data which confirms whose licence is due to expire, checking this data, processing of the paperwork, packing the letters, postage, paper, printing and envelopes. I accept that all associated papers are available on the website but the cost is for the reminder process (as above) in addition to the paperwork.
3. The Table of Fares card was supplied to drivers previously laminated and is now supplied to drivers with a plastic coating equivalent to laminating in order to prolong the life of the card. In regard to your comment about the hologram I accept that there have been some plates issued without the reflective 'glow in the dark' background and hologram this was an error made by our suppliers in a batch of plates they supplied and unfortunately was not picked up straight away by the officers. However this has now been corrected and plates are currently being issued correctly.
4. I have read Frances' previous response and can only conclude that your question 4 refers to Frances' question 7 response. In which she is referring to the changing of name and address details, this could be for an Operator or Vehicle where no plates or badges are required to be printed and therefore is an administrative charged based on receiving the request for a change of details, attaching the documentation to the account, checking the request and updating the system details.
5. I am unable to provide you with an exact cost for the online application provision at this time, it is part of a larger project for all licences not just for operators and drivers. However, all costs will be kept to a minimum and where possible existing resources will be utilised to deliver on this project. It is envisaged that this provision will be available within the next financial year.
6. You will note that the Hackney Carriage Licence fees have increased this revised figure takes into account the cost of compliance checks of Hackney Carriages.

I hope the above information clarifies the questions you have raised. If not, please do not hesitate to contact me. Please be reminded that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Kind Regards

Mandy

Mandy Beaver

Team Manager - Operational Community Safety

Public Protection

Shropshire Council

Shirehall

Abbey Foregate

Shrewsbury

Shropshire

SY2 6ND

Tel: 01743 251702

Mobile: 07582 004877

Email: mandy.beever@shropshire.gov.uk

Web: www.shropshire.gov.uk

From:

Sent: 26 October 2013 15:22

To: Frances Darling; Mandy Beever; Paul McGreary

Subject: RE: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Dear Frances Darling.

Thank you for answering the points previously made.

Can you just clarify these remaining issues .

- 1) Can you amend the papers to state that "Private Hire door signs are included in the cost & the Private hire.
& that the door signs @ £16-00 per pair are for replacement following loss or damage ?.
- 2) Are you sure that a reminder letter for existing licenced vehicles costs £7.00 to send out ?. as all associated papers are available to down load from Shropshire Councils web site.
- 3) The table of fare card is **NOT** supplied to drivers by Shropshire council laminated ?. the interior licence plate **does not contain** at present or approved hologram as previously prescribed and are not being issued with glow in the dark backing , can you find out why?
- 4) can you explain what type of licence transfer you are referring to, is it vehicle or operator ?
- 5) How much has been spent on the online application provision and how much money will be saved by drivers and operators. Will this provision be available within the next financial period.

6) You state that compliance check of private hire vehicles is paid for by private hire operators, how is compliance of hackney vehicles paid for.

yours faithfully

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.

From: frances.darling@shropshire.gov.uk

To:

CC: mandy.beever@shropshire.gov.uk

Subject: Proposed variation to Shropshire Council licensing fees (Shropshire Council Ref: R/236213)

Date: Fri, 25 Oct 2013 14:17:52 +0000

Dear

Further to your email of 18 October, please find responses to your questions detailed below:-

1. A "hackney carriage proprietors licence" is a hackney carriage vehicle licence as referred to in the relevant sections of Part II of the Local Government (Miscellaneous Provisions) Act 1976. I apologise for any confusion our terminology may have caused.
2. The difference in the proposed fees for a new private hire vehicle and a new hackney carriage vehicle licence is due to the fact that the private hire vehicle licence fee includes the cost of a pair of side door plates; these plates are not required for hackney carriages.
3. The renewal fees for private hire and hackney carriage licences are marginally more expensive than the new licence fees because the renewal process actually involves everything that the new licence process involves AND the additional costs associated with issuing the reminder paperwork.
4. The costs of the replacement exterior and interior plates are made up of the officer time to record the request and to produce the plates, together with the direct costs that the authority is charged for the actual items that make up the plates. The officer time is the same for each type of plate but the cost of the items for the plates differs. For the exterior plates, the authority is charged £4.70 for a pre-printed template, plastic outer cover and label and for the interior plates the charge is £4.94 for a pre-printed template with glow in the dark backing and label. It is the glow in the dark backing that increases the cost.
5. a) The proposed cost of producing the table of fares card has been calculated from officer time to record the request and the time to produce the card, together with the direct costs that the authority is charged by the printers. The actual printing/laminating cost per card to the authority is £0.24. On reflection, we have built in the cost of producing the card twice, i.e. by the authority and the printers, when in fact the production of the card is undertaken by external printers. On this basis, I will be proposing to the Licensing & Safety Sub-Committee that this particular fee is reduced to £2.50/card. (This may actually be even less as I am currently in the process of checking additional legal requirements under the Local Government Act 1972 that may require the authority to further reduce this particular fee.)
5. b) With respect to making the card details available to download from the Council's website, I can see no reason why we would not do this and will make this recommendation

to the Sub-Committee. The only practical issue I foresee for drivers is that clearly the card would not be laminated if downloaded in this way. Whilst it is not essential that it is laminated, this does prevent the card from becoming damaged/defaced and I would recommend drivers arrange this separately if they were to choose the download option.

6. The private hire operator fees were considered in detail with the over-riding principle being that those operators who have a greater impact on the licensing service ought to pay more than those who impact less. The actual basic cost of processing an operator's licence is the same for any operator irrespective of the number of vehicles they operate and hence the minimum fee for up to 5 vehicles has been calculated at £86 and £118 for 1 year and 3 years respectively. This includes an amount to cover enforcement of the private hire regime in terms of compliance checks on licensed vehicles but also reflecting the position of a significantly smaller number of vehicles that require these checks. The increasing scale of fees for larger operators is based on adding additional officer time per vehicle to carry out a greater number of compliance checks and to deal with the additional level of work that is generated as a result of the larger number of vehicles involved. A formula based approach has been adopted to work out the specific fees and averages have been used where necessary with the aim of making the fees as fair as possible to all operators without creating unhelpful bureaucracy in the process.

7. The license holder transfer/change of details fee of £10 relates to very minor changes that would be made on the licensing database and would not involve significant officer time or materials. In effect, they are examples of administrative changes that do not involve officers undertaking checks or producing paperwork/plates, etc. It is not envisaged that these types of administrative changes will be a regular occurrence; however, we wanted to ensure they were catered for in the event that such changes are required.

8. With respect to what you refer to as the "online licence application", we are currently embarking on a project to introduce an online application and payment process for all licences, but this is not in place as yet.

9. The drivers' joint badge fees do include the Disclosure and Barring Service (DBS) check, which was previously the CRB check, and also the DVLA fee. For the 1 year badge, it also includes the first knowledge test and the first driver training assessment. I will ensure this is made clear in any future papers, in particular when the fees are finalised by the Sub-Committee.

I trust that the above information clarifies the position in respect of each of the questions you raised. If not, please do not hesitate to contact me. I would remind you that the deadline for objections, in respect of the proposed variation to the fees, is noon on the 30 October 2013.

Yours sincerely

Frances Darling

Service Manager – Safer & Stronger Communities

Public Protection

Email: frances.darling@shropshire.gov.uk

Tel: 01743 251715

Mobile: 0758 200 4868

Fax: 01743 254114

Web: www.shropshire.gov.uk

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>

Mandy Beever

From:
Sent: 29 October 2013 20:11
To: Licensing
Cc: Steve Charmley; Peter M Adams; Vernon Bushell; Joyce Barrow; Andrew B Davies; Keith Roberts; Richard Huffer; Roger Hughes; Jon Tandy; Rosanna Taylor-Smith; Robert Tindall; Mandy Beever; Keith Barrow; Paul McGreary; Frances Darling
Subject: Formal objection to the proposed variation to the fees,
Attachments: Licensing & safety sub committee.docx

Formal objection to the proposed variation to the feesLicensing & safety sub committee

Dear Councillors.

We are objecting to any increase to the proposed chargeable permissible fees unless the level of service provided to us by your licensing department greatly increases, at present it falls far short of what is necessary for us to operate in a legal & cost effective manner & assurances that the licensing function operates as revenue neutral.

We would expect to have a level of service that is compliant with the statutory requirement of a local authority.

We are experiencing long periods of downtime due to the council's inability to fulfil its licensing function.

Many drivers have been forced to contravene statutory requirements and have operated illegally in many instances due to long delays in processing applications & lack of communication with licensing officers and drivers are being asked to travel out of their zones to have vehicles checked for compliance in other zones.

We have had little or no enforcement to address un-licenced vehicles & drivers operating in our Zone .

We have we seen dramatic cuts to service in Zone 3 and staffing reduced to an unacceptable level, yet for 2011-2012 revenue for licencing fees made an illegal profit.

As a minimum requirement licensing officers should be available at Castle View offices in our zones from 9-5 Mon to Fri.

Can you offer assurances that these issues are addressed and our request met?

Further to email received from Francis Darling (dated 18th October) She has made assurances to myself that anomalies that have been raised within the over egged costing's will be amended before the licensing sub & safety committee meets to discuss fees.

E-mail Disclaimer :

This e-mail and any attachments are confidential and intended solely for the use of the individual to whom they are addressed.

Any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited without the express permission of the Author This communication may contain material (in the body or as an attachment) protected by law from being passed on. Any views or opinions presented are solely those of the author No contractual arrangement is intended to arise from this communication. If you are not the intended recipient, be advised that you have received this e-mail in

error and that any use, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the Author.

Formal objection to the proposed variation to the fees

Licensing & safety sub committee

Dear Councillors,

We are objecting to any increase to the proposed chargeable permissible fees unless the level of service provided to us by your licensing department greatly increases, at present it falls far short of what is necessary for us to operate in a legal & cost effective manner & assurances that the licensing function operates as revenue neutral.

We would expect to have a level of service that is compliant with the statutory requirement of a local authority.

We are experiencing long periods of downtime due to the council's inability to fulfil its licensing function.

Many drivers have been forced to contravene statutory requirements and have operated illegally in many instances due to long delays in processing applications & lack of communication with licensing officers and drivers are being asked to travel out of their zones to have vehicles checked for compliance in other zones.

We have had little or no enforcement to address un-licenced vehicles & drivers operating in our Zone .

We have we seen dramatic cuts to service in Zone 3 and staffing reduced to an unacceptable level, yet for 2011-2012 revenue for licencing fees made an illegal profit.

As a minimum requirement licensing officers should be available at offices in our zones from 9-5 Mon to Fri.

Can you offer assurances that these issues are addressed and our request met?

Further to email received from Francis Darling (dated 18th October) She has made assurances to myself that anomalies that have been raised within the over egged costing's will be amended before the licensing sub & safety committee meets to discuss fees.

Mandy Beever

From: Mandy Beever
Sent: 04 November 2013 12:41
To:
Subject: Taxi Licensing Fees Consultation

Good Afternoon

Please accept this email as confirmation that your objection to the proposed Taxi Licensing Fees has been received, you will be notified separately of the date, time and venue of the meeting at which objections to the fee proposal are to be considered.

Kind Regards

Mandy

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 251702
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

Mandy Beever

From: Tracey Yates
Sent: 30 October 2013 09:51
To: Mandy Beever
Subject: FW: Proposed licence fee increases.

Hi Mandy

For your attention.

Regards

Tracey Yates
Personal Assistant to:-
Neil Langford, Head of Programme Management, Systems & Transition
Paul McGreary, Head of Public Protection

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Tel: 01743 253005

E-mail: tracey.yates@shropshire.gov.uk

Web: www.shropshire.gov.uk

From:
Sent: 29 October 2013 14:40
To: Frances Darling; Paul McGreary; Michael Wood; higginst67@hotmail.com; Robert Tindall; Rosanna Taylor-Smith; Jon Tandy; Robert Macey; Roger Hughes; Richard Huffer; Keith Roberts; Nigel Hartin; Andrew B Davies; Steve Davenport; Peter Cherrington; Joyce Barrow; Vernon Bushell; Peter M Adams
Subject: Proposed licence fee increases.

Dear Frances Darling.

At the risk of once again being branded malicious and vexatious I am emailing to object to the proposed licencing fee increases. I am not objecting to the fact that you want to change the fees just to the inaccurate way the fees have been set.

As you know, you are forbidden by law from profiting from the fees, as you are also forbidden from subsidising the fees from council tax payers pockets.

You calculations though are just hit and miss guess work, pulled from a magicians hat.

One example I must point out to you is the £2 difference between the replacement cost of the internal and external plate. The cost of a pre printed external plate to the council is £4.70 and the cost of the internal plate to the council is £4.94. A cost difference of £0.24. You

propose charging us £2 more for the plate. A clear profit to the council of £1.76. Can you please justify 800% mark up on the 24pence. I pointed out to licencing at the time of unification that licencing decision to keep the five zones was not legal. This is still the case, but you are all determined to try and charge five separate zones the same standard fees. It is not legal You cannot bring the other four zones into the calculations for setting the fees for zone 3. It is not possible that the costs of issuing licences for all five zones just happens to work out the same for each zone. I am licenced to drive my hackney vehicle in zone 3. I want my fees set according to the costs generated by zone 3. I do not want to pay for the taxi ranks in Shrewsbury zone 1, ranks that I am not allowed to use. It is illegal for you to calculate my licence fees based on the costs of licencing in Shrewsbury, just as it is illegal to base my fees on the costs of issuing licenses in Manchester or Birmingham, which of course you don't do. Why do you think it is in order to bring the other four Shropshire zones into the calculation of my fees. I have noted that in some of your documentation you compare the charges of other licensing authorities, such as Telford, to the costs calculated for Shropshire. Why? Their costs and charges have nothing to do with us. You are obliged by law to charge us what it costs to licence us. Not a penny more nor a penny less. The continued comparison of Shropshire councils charges to those of other authorities is proof that you have not calculated your costs correctly. For you to just estimate the cost by comparing other councils costs is not the way to do things. There are so many mistakes in your proposals I do not have the time or energy to point them all out, but one crass example is the operators licence fee. You cannot charge different fees depending on how many cars are on each operators books. Most of the cars are owner operated. The operators are nothing more than booking agents. How can you justify charging them different fees depending on how many different cars they take bookings for. Any fees have already been paid by the owners who licence their cars. You seem to want to charge twice. It was licencing who went against the proposals to have only one zone for the whole of Shropshire so you are obliged to have five different fees. Five different fare cards. And most importantly five different offices dealing with the applications. Your continued attempts to force drivers to deal with Shrewsbury or Wem are out of order. Can you please make sure that all members of the committee receive all objections to your proposed fee increases, including the very detailed objections you will be receiving from _____ from _____ who has been engaged to act on behalf of _____ and _____

I would like to suggest that in order to save your time, and our money, you consider engaging the services of _____ to go over any future proposals you make before putting them out for consideration of the committee and trade. There is no shame in admitting that you need the help of an expert. _____ is an expert in his field. Unlike Shropshire Council licensing, he knows the licensing laws inside out. You would be well advised to take his advice. It would almost certainly work out cheaper for all concerned if he enabled you to get things right from the start.

Regards

Mandy Beever

From: Mandy Beever
Sent: 04 November 2013 12:53
To:
Subject: Taxi Licensing Fees Consultation

Good Afternoon

Please accept this email as confirmation that your objection to the proposed Taxi Licensing Fees has been received and you will be notified separately of the date, time and venue of the meeting at which objections to the fee proposal are to be considered.

Kind Regards

Mandy

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 251702

Mobile: 07582 004877

Email: mandy.beever@shropshire.gov.uk

Web: www.shropshire.gov.uk

Mandy Beever

From: Mandy Beever
Sent: 04 November 2013 12:49
To:
Subject: Taxi Licensing Fees Consultation

Good Afternoon

Please accept this email as confirmation that your objection to the proposed Taxi Licensing Fees has been received and you will be notified separately of the date, time and venue of the meeting at which objections to the fee proposal are to be considered.

Kind Regards,

Mandy

Mandy Beever
Team Manager - Operational Community Safety
Public Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Tel: 01743 251702
Mobile: 07582 004877
Email: mandy.beever@shropshire.gov.uk
Web: www.shropshire.gov.uk

ATTENTION OF
LICENSING DEPT!!
~~TAXI LICENSING~~

SHROPSHIRE COUNCIL
31 OCT 2013

Dear Shropshire Licensing,

I have been informed that the Council are increasing the fees by 26% in some cases this is ridiculous in 2009 when the Council became unified the taxi fees increased then, until Oswestry Taxi Drivers Association objected to the increasing fees rigorously, subsequently they were advised by Brian Johnson and they reduced dramatically! As you are aware the Council are not allowed to make a profit off taxi's, however I have been informed that last year the Council made a substantial profit from taxi's so instead of an increase there should be a reduction.

A few points I wish to make. Has to do with the running cost of licensing when I first applied for my taxi licence twenty years ago there was only four sheets of paper, why you now need this amount of paper these days is ridiculous.

I have also been informed that when the new drivers sit there knowledge test concerning the map section that the people supervising have to be told by the candidate when they get it wrong. This happened to a driver who has lived in Shropshire all his life and they had to go away and check.

The amount of MOT's a taxi requires during the year does not seem something relevant unless you are licensing a vehicle and one question on the test being where can you take a car for an MOT and replying an authorised test centre and being then told your wrong seems factually incorrect. These questions should be more accurate. There are some questions that seem completely irrelevant to becoming a taxi driver such as where the first Olympic games were held. What this has to do with driving a taxi seems ridiculous.

If your unemployed and paying out £166 to apply for a taxi licence and then the cost of a medical which can be anything up to £100 with all the other costs on top such as hiring the vehicle for your driving assessment at £30 and to re-sit your knowledge test should you fail at another £62 only to be told you are not a fit and proper person to drive a private hire or hackney carriage vehicle in Shropshire after you have lived here all your life yet your CRB states otherwise please explain to me what degree you have to reach to be suitable. The government is trying to decrease the amount of unemployed but in an area such as this it is difficult but the licensing authority is making almost impossible for those applying for their taxi licence.

Why does it take up to four months and in some cases longer to process the application for your licence and they do not actually get the opportunity to apply for their CRB which can take anything up to six weeks on its own until they sit there knowledge test when in other areas from start to finish it only takes up to three weeks. Example Welshpool and Wrexham it only takes a minimal amount of time, here the drivers are waiting weeks on end for an appointment and it is virtually impossible to get someone from licensing on the telephone as they are keeping only

LICENSING
OPERATIONAL SERVICES
31 OCT 2013



ATTENTION OF LICENSING DEPT. 11.

morning office hours and messages are not responded to this does not only apply to new applicants but it also a serious problem for operators and existing drivers. The lack of communication for re-licensing and re-plating is also a serious problem created by not being told when your plates or licence are ready for collection something that would take only a simple phone call.

Other departments at Shropshire Council seem to be better equip to deal with certain parts of the application as with the CRB or as it is now called the DBS as those applying for escorts/carers badges can achieve this in approximately ten days with an appointment that some parts of the Council can do online why is this not being made available to those applying for a taxi licence.



Public Protection and Enforcement
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Contact: Mrs A Beever

Direct Line: 01743 251702

Email: Mandy.Beever@shropshire.gov.uk

19 November 2013

Dear .

Please accept this letter as confirmation that your objection to the proposed Taxi Licensing Fees has been received, you will be notified separately of the date, time and venue of the meeting at which objections to the fee proposal are to be considered.

Yours sincerely

Mrs A Beever
Team Manager - Operational Community Safety

Mandy Beever

From: Frances Darling
Sent: 13 November 2013 08:56
Subject: Shropshire Council Licensing & Safety Sub-committee Meeting

Dear Sir

Local Government (Miscellaneous Provisions) Act 1976

Further to receipt of your objections/comments concerning Shropshire Council's proposed variation to the fees relating to hackney carriage vehicle and driver's licences and private hire vehicle, driver's and operator's licenses, I confirm that the Licensing & Safety Sub-committee meeting that will consider your objections/comments will take place on **28 November 2013 at 14:00**. The location of the meeting will be the Shrewsbury Room at Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND. The papers for the meeting will be available on the Council's website (<http://shropsdemserv.web.coop/live/dynamic/DemServMeetings.asp>) from 20 November 2013.

Yours faithfully
Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection

Email: frances.darling@shropshire.gov.uk
Tel: 01743 251715
Mobile: 0758 200 4868
Fax: 01743 254114

Web: www.shropshire.gov.uk

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Date: 13 November 2013
My ref: 236213/fmd
Your ref:

Dear

Local Government (Miscellaneous Provisions) Act 1976

Further to receipt of your objections/comments concerning Shropshire Council's proposed variation to the fees relating to hackney carriage vehicle and driver's licences and private hire vehicle, driver's and operator's licences, I confirm that the Licensing & Safety Sub-committee meeting that will consider your objections/comments will take place on **28 November 2013 at 14:00**.

The location of the meeting will be the Shrewsbury Room at Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND. The papers for the meeting will be available on the Council's website (details of the link are given below) from 20 November 2013.

<http://shropsdemserv.web.coop/live/dynamic/DemServMeetings.asp>

Yours faithfully

Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection
Email: frances.darling@shropshire.gov.uk
Tel: 01743 251715
Mobile: 0758 200 4868
Fax: 01743 254114

Mandy Beaver

From:
Sent: 13 November 2013 09:14
To: Frances Darling
Subject: RE: Shropshire Council Licensing & Safety Sub-committee Meeting

Dear Mrs Darling,

Thank you for your email below, which I appreciate you probably sent to all objectors and that, in those circumstances, it does not address requests to address the Sub-committee.

Can you please confirm that I have been registered to speak and / or provide me with the contact details of the (democratic services) officer with whom I should register my request.

Many thanks,

From: Frances Darling [<mailto:frances.darling@shropshire.gov.uk>]
Sent: 13 November 2013 08:56
Subject: Shropshire Council Licensing & Safety Sub-committee Meeting

Dear Sir

Local Government (Miscellaneous Provisions) Act 1976

Further to receipt of your objections/comments concerning Shropshire Council's proposed variation to the fees relating to hackney carriage vehicle and driver's licences and private hire vehicle, driver's and operator's licenses, I confirm that the Licensing & Safety Sub-committee meeting that will consider your objections/comments will take place on **28 November 2013 at 14:00**. The location of the meeting will be the Shrewsbury Room at Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND. The papers for the meeting will be available on the Council's website (<http://shropsdemserv.web.coop/live/dynamic/DemServMeetings.asp>) from 20 November 2013.

Mandy Beever

From: Frances Darling
Sent: 13 November 2013 09:49
To:
Subject: RE: Shropshire Council Licensing & Safety Sub-committee Meeting

Dear

With respect to your request to speak at the Licensing & Safety Sub-committee meeting on the 28 November 2013, please follow the instructions available on the Council's website (see link below). I would, in particular, draw your attention to the information detailed in the Public Question Guidance Leaflet that is available at the link below.

<http://shropdemserv.web.coop/CommitteeServices/CouncilMeetingsAndDecisions/PublicQuestionTime>

Please note that this email is NOT confirmation that you are registered to speak at the meeting.

Yours sincerely
Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection

Email: frances.darling@shropshire.gov.uk
Tel: 01743 251715
Mobile: 0758 200 4868
Fax: 01743 254114

Web: www.shropshire.gov.uk

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally.
Please inform the sender of the error and then delete the original email.
For more information, please refer to <http://www.shropshire.gov.uk/privacy.nsf>.

Mandy Beever

From: .
Sent: 13 November 2013 09:59
To: democracy; publicquestions@shropshire.gov.uk
Cc: Frances Darling
Subject: Licensing & Safety Sub-committee Meeting - Thursday, 28 November 2013 at 2pm

Dear Sir / Madam,

With regards to the above meeting, at which I understand a report shall be presented in connection with taxi (hackney carriage and private hire) licensing, I should be obliged if you would kindly accept this email as my request to the Chief Executive for permission to speak in relation to the proposal to vary taxi licensing fees at the above meeting.

I look forward to hearing from you.

Yours faithfully,

Mandy Beever

From: Frances Darling
Sent: 18 November 2013 20:48
To:
Subject: Licensing & Safety Sub-committee meeting - response to letter
Attachments: 131118 FMD - response to

Dear

Please find attached my response to your letter of 29 October 2013.

Yours sincerely
Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection

Email: frances.darling@shropshire.gov.uk

Tel: 01743 251715

Mobile: 0758 200 4868

Fax: 01743 254114

Web: www.shropshire.gov.uk

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Date: 18 November 2013
My ref: 236213/fmd
Your ref: -

Dear Sir

Local Government (Miscellaneous Provisions) Act 1976, sections 53 and 70
Hackney Carriage Proprietor's Licence and Hackney Carriage Driver's Licence
Fees for zones 1, 2, 3, 4 and 5
Private Hire Vehicle Licence, Private Hire Operator's Licence, Private Hire
Vehicle Driver's Licence Fees
Objection by

Thank you for your letter, dated 29 October 2013, in respect of the above. Please find my response below under the headings as set out in your letter.

Financial analysis

The financial analysis undertaken to determine the total recoverable cost of the various hackney carriage and private hire licences is based on financial information from the early part of 2013. It is acknowledged that changes have occurred since that time and will continue to occur as the authority continues to reshape in response to increasing financial pressures. These changes will be taken into account when setting fees for 2015/16 and beyond.

The specific matter relating to the apparent elimination of a £60,000 deficit in 2011/12 has been incorporated into the overall analysis based on the information that was available in July 2012. The present figures are based on a comprehensive analysis of the sums due. This analysis was undertaken with input from licensing officers, public protection managers and with the full support and technical expertise from the authority's finance officers. I am satisfied that the overall basis of the current calculations is sufficiently robust based on the available information.

Driver Licensing

The "additional 0.5 hour of officer time for further compliance checks in each of yrs 2 &

Continued ...

Page 2

3¹ was unintentionally included in the 3 year driver's licence renewal fee. This will be removed and the proposed fee reduced from £172 to £156. I have also taken the opportunity to verify the calculations for the one year driver's licence fee and can confirm that no enforcement costs were included in this respect; accordingly, the proposed fee for this particular licence remains at £204.

With respect to the comparative cost between the initial cost of a one year licence and the cost of a renewal and grant of a three year licence, the costs we pay for the DBS check, the driver training assessment and the DVLA check are all fixed costs payable to other bodies. These costs are passed on directly and clearly form part of the overall licence fee. The cost of the knowledge test is not a separate cost when determining this overall fee. Instead, the cost is built into the overall licensing process; in effect, drivers benefit from a better rate for the knowledge test when they sit the test initially. This is because the costs associated with resitting the knowledge test outside the normal licensing process are greater as a result of the formula based approach adopted to apportion non-staff related costs. As a result, your assumption that the separately listed knowledge test resit fee of £77 is the cost of the initial knowledge test is incorrect. Consequently, the basis upon which you have determined that the fee for a renewed three year driver's licence ought to be £97, rather than the proposed £172 (now £156 as detailed above), is incorrect.

In principle, knowledge tests are not undertaken on what you refer to as a 'one-to-one basis'; however, there have been exceptional circumstances where this approach has been adopted but this is likely to remain the exception rather than a facility that is offered as part of normal service delivery. In the main, we provide knowledge test sessions with a maximum of 10 drivers in each session and we run up to 4 sessions in a day. The numbers you have suggested in a single session are simply not manageable with the staff we have available. In addition, as referred to above, it is not officer time alone that determines the cost of delivering the knowledge test for each driver.

Vehicle licensing

Your statement that the cost of receiving, determining and processing the grant of a new private hire vehicle licence and undertaking compliance checks for the 12 month period is £145, i.e. £160 less the £15 cost of the side plates is, in principle, correct. However, the side plates are an integral part of granting this type of licence; consequently, the cost of the side plates is incorporated into the new licence fee from the outset. With respect to granting a renewal or a vehicle transfer in relation to a private hire vehicle licence, the cost of the side plates is again included. In taking this approach, the authority is providing vehicle owners with the wherewithal to comply with the licensing conditions as it relates to the display of side plates.

Continued ...

¹ Appendix A Part 3 to the Licensing Fees and Charges 2014 – 2015 Report presented to Strategic Licensing Committee on 25 September 2013

Page 3

With respect to your concerns about the renewal fees being £7 more than the initial grant, this is made up of the costs associated with generating and sending out renewal reminders, together with additional officer time built in to take account of increased work in relation to obtaining up-to-date MOT and insurance documents during the period of the licence. This latter point was not made clear in my recent response to the , to which you refer on page 3 of your letter.

Your comments suggesting ways to streamline and simplify the renewals process will be taken into account as we continue with our commitment towards introducing online application and payment processes. In addition, I have also noted your comments concerning the expectation that hackney carriage vehicle licence fees ought to be higher than private hire vehicle licence fees based on recovering costs for the provision and maintenance of taxi ranks. Whilst the proposed fees take into account the costs incurred by public protection, they do not currently incorporate the highways element of providing and maintaining taxi ranks; this will be given due consideration in future fees calculations.

With respect to the production of the hackney carriage fare card, we choose to have the card produced externally in its current format as it makes it more robust and better able to withstand wear and tear. In addition, the risk of it becoming defaced and illegible whilst in use is reduced. However, again I note the suggestions you have made in this respect.

Private hire operator licensing

You have indicated that the costs of compliance checking that we are proposing to attribute to private hire operators should, in fact, be attributed to individual vehicle licence holders. You have further indicated that this is because private hire operators are licensed, in effect, as booking agents. In addition, you refer again to my response to the

On reflection, I might have expressed myself more clearly in my response to the Association when I referred to "... compliance checks on licensed vehicles" and "... adding additional officer time per vehicle to carry out a greater number of compliance checks..." Perhaps a more helpful response would have referred to the additional officer time required to check the booking records held by the private hire operators in relation to the drivers and vehicles that are being used. Consequently, private hire operators who take bookings for a large number of drivers and their vehicles, compared to those who take bookings for a small number, will inevitably generate a greater number of bookings and a greater burden is then placed on the authority to carry out compliance checks in relation to those bookings. This is in addition to the increased level of work that is generated simply as a result of an increased number of bookings made by a greater number of customers that ultimately lead to a greater number of contacts with the authority that have to be dealt with.

Continued ...

I disagree with your suggestion that operators are simply booking agents; the courts have agreed with James Button that private hire operators are the lynch-pin of the private hire licensing regime and the legislation places considerable duties on such operators to ensure that the vehicles and drivers which they operate are properly licensed. The legislation emphasises this by specifically setting out that every contract for the hire of a private hire vehicle is deemed to have been made with the operator who accepted the booking for the vehicle and this is irrespective of whether the operator himself provided the actual vehicle.

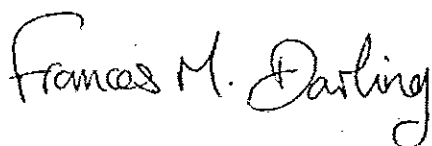
Furthermore, in order to ensure that a private hire operator remains a "fit and proper person" to hold an operator's licence, it is incumbent on that operator to ensure, to at least some degree, that the drivers and vehicles that he is responsible for operating do actually comply with the licensing regime as it relates to private hire. Operators contract with members of the public to supply them with hired vehicles; it is entirely reasonable that operators should pay a proportion of the cost of vehicle checks that are required to ensure that they are not hiring out vehicles that are a danger to the public. This authority will always maintain that operators have some responsibility for the vehicles they operate; it is, therefore, appropriate and reasonable for this authority to take measures to ensure such responsibility is being acted upon to an acceptable level.

It should be noted that the estimated officer time used in the fees calculations was significantly less than the time actually taken by officers in the recent fleet checks that have been undertaken by the authority. Furthermore, private hire vehicle owners have and will continue to bear the initial compliance check cost associated with their vehicles as this is incorporated into the annual private hire vehicle licence fee.

Adoption – Local Government (Miscellaneous Provisions) Act 1976, Part II

With respect to your invitation to the authority to prove the adoption of the relevant legislation, this is a matter that cannot be addressed in advance of the Licensing & Safety Sub-committee meeting due to be held on 28 November 2013. In this respect, I will respond to you in due course.

Yours sincerely



Frances Darling
Service Manager – Safer & Stronger Communities
Public Protection
frances.darling@shropshire.gov.uk
Tel: 01743 251715