

Appendix 3 Responses to Consultation

Number	Response Received to Consultation	Officer Comment
1.	<p>I am writing to express my concerns regarding the proposed increase in licensing fees and charges for the taxi trade in our borough.</p> <p>While I understand the need to maintain high standards within the industry, the significant rise in fees poses considerable challenges for drivers like myself. Many of us are already facing financial strain due to rising operational costs and economic conditions. Increasing these fees may further impact our ability to sustain our businesses and could lead to higher fares for passengers.</p> <p>Moreover, I would like to bring to your attention that other licensing authorities are now operating within East Staffordshire, offering badges at considerably lower rates than ours. This creates an uneven playing field and places local drivers at a disadvantage, as it encourages drivers to obtain licenses from other areas, which can impact local livelihoods and service standards within the borough.</p> <p>I kindly urge the council to reconsider the fee increases or to address the competitive disparities resulting from this cross-border licensing issue. Collaboration with other local authorities to standardize fees and ensure fair competition could be a beneficial approach.</p> <p>Thank you for your attention to these matters, and I look forward to any opportunity for dialogue or consultation on this subject.</p> <p>Sincerely,</p>	<p>8 emails received individually from members of the trade in response to the consultation.</p> <p>Names have been redacted.</p>
	<p>Good evening , A bundle of thanks for giving me opportunity to say something about licence fees. I honestly propose £110 for 3 years. Thanks Regards</p>	<p>Name and address redacted.</p>
	<p><b>(Private And Confidential)</b> (Without Prejudice)</p>	<p>Please see Appendix 3 also sent in by [REDACTED] as</p>

From: [REDACTED] (Representing Burton Taxi Association- Private Members Club), [REDACTED]  
[REDACTED]  
To: Andy O'Brien (Chief Executive)  
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Burton-on-Trent, DE14 9JG  
C.C: Mark Rizk mark.rizk@eaststaffsbc.gov.uk, John  
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andrea.davies@eaststaffsbc.gov.uk,  
Petitions@eaststaffsbc.gov.uk,  
Licensing@eaststaffsbc.gov.uk  
Reference: **NOTICE-OF-CONDITIONAL-ACCEPTANCE,  
NOTICE-OF-PETITION**, Unfair Proposed Price Increase  
Equity Law, Common Law, Equality Act 2010, The  
Unfair Contract Terms Act 1977, Department for  
Transport's (DfT) Taxi and Private Hire Vehicle  
Licensing: Best Practice Guidance etc  
Date: Tuesday 24th September 2024  
**Notice To Agent Is Notice To Principal And Vice Versa**

Dear Andy O'Brien and All Agents/Principals,  
We hope our correspondence reaches you in good  
health, wealth and happiness.  
The reason we are writing to you is because of certain  
changes in the proposed policy that go against current  
legislation and equity/equality and is unfair due to to  
the current economic situation within England  
(Inflation and cost of living crisis). We require a full  
response to each point raised within our Notice and  
ask the Council to **put on hold all proposed price  
increases!**

**Petition to: East Staffordshire Borough Council,  
Licensing & Enforcement Office**

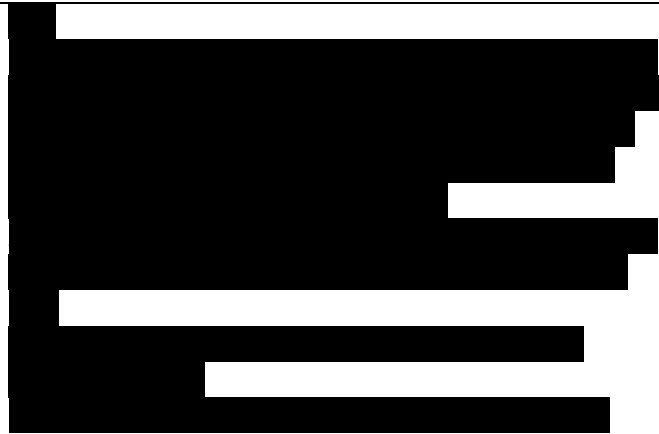
**Subject Of Petition/Notice: Hackney Carriage &  
Private Hire Licensing Policy Proposed Price Increase**

We the under-named/under-signed, being Electors of  
the Councilors for ESBC here demand: An immediate  
review of the latest Proposed Price Increase 2024. The  
reasons and grounds will be given throughout this  
legal Notice.

[REDACTED] - Representing 'Burton Taxi  
Association', (Private Members Club). [REDACTED]  
[REDACTED]  
[REDACTED]

part of his response to the  
consultation.

Names and addresses  
redacted.



**(The above is to satisfy the requirement for this petition but we have the support in the hundreds which can be relied on at a later date)**

We totally oppose the proposed price increase because it goes against the Department Of Transport guidelines issued to the local councils plus there is evidence from neighbouring councils that have cheaper licensing fees than our current fees nevermind the proposed price increase fees! (Some of these are even classed as cities and have more opportunities than us, we are from a town).

We draw your attention to the following, which is a summary of the guidance issued by Department Of Transport UK England.

In the UK, the guidance issued by the central government regarding local licensing councils and the setting of licensing fees for taxi drivers is primarily outlined in the **\*\*Department for Transport's (DfT) Taxi and Private Hire Vehicle Licensing: Best Practice Guidance\*\***.

**### Key Points of the Guidance:**

1. **\*\*Cost Recovery Basis\*\***: Licensing fees for taxi and private hire drivers should be set on a cost recovery basis. This means that the fees should cover the costs associated with processing applications, conducting background checks, and other regulatory responsibilities **rather than generating profit**.
2. **\*\*Transparency\*\***: Councils are encouraged to be transparent when determining fees. They should provide clear information about how fees are calculated and what costs are involved in the licensing process.
3. **\*\*Review of Fees\*\***: Local councils should regularly review their licensing fees to ensure they remain appropriate and **reflect the actual costs incurred**. This review should take place at least every three years, although more frequent reviews may be necessary if there are significant changes to costs.

4. **Consultation**: When councils propose changes to licensing fees, they are encouraged to consult with existing taxi and private hire operators/drivers to gather feedback and assess the impact of potential fee changes.

5. **Consideration of Risks**: Councils should consider any potential risks that might affect the taxi and private hire vehicle sector, including **economic factors that could impact drivers and operators**.

6. **Regulatory Compliance**: Local authorities must ensure that their licensing processes comply with national legislation and regulations, which includes ensuring **that fees are lawful and justified**.

7. **Support for Drivers**: Licensing authorities **are also advised to provide support** and information to taxi drivers and operators about the licensing process and any changes to fees to help them understand their obligations.

### ### Conclusion

The ultimate aim of the guidance is to provide a transparent and fair licensing system that **supports the safety and welfare of the public while ensuring that taxi drivers are treated fairly**.

The current proposed price increase contradicts the current guidance above **because it is not treating us fairly in the current economic climate**. There is a cost of living crisis that is affecting not only the drivers but the population at large.

**Our prices are still the same for many years, there has not been a major increase in earnings, instead we are dealing with more problems due to inflation and the costs of food and energy. The people that are our customers are also struggling and we cannot burden them more by adding on more money to the price of their taxis as it stands.**

**Some of these include, single mothers, people on benefits, disabled passengers, pensioners etc. A lot of these rely on taxis and are vulnerable so a price increase would be detrimental to them and us.**

We are also attaching evidence from neighbouring councils showing that their prices are already lower than what we are currently paying and your proposal cannot be justified if we compare this.

### Example

**NW Leicestershire charges £285 for a 3 year drivers license which is still £45 cheaper than our current price of £330.**

**Birmingham C Council charges £225 for a 3 year renewal for a badge, for a hackney renewal it's £142 for the year.**

**Derby C Council charges £361 for the 3 year badge plus only £124 for Hackney Carriage renewal. South Derbyshire Council charges £265 for the 3 year badge and £190 for the vehicle license.**

What we want?

**We want an immediate hold on the price increase because it goes against many points already raised above.**

Thanking you

Kind Regards

██████████ representing Burton Taxi Association  
(PMC) On this blessed day Tuesday 24th September  
2024, All Rights Reserved

**\*\*\*Notice: To save the trees we are using the medium of email to send our legal Notice/Petition, this should and will be treated equally as if it had been delivered by recorded post in a physical format. If for any reason you require us to send the physical copy by hand or post then do not hesitate in asking us, we would gladly do that. If you don't then this would be deemed as served, delivered and accepted. Thankyou\*\*\***