

**Report of the Assistant Director to the  
General Licensing Regulatory Board  
to be held on the 23<sup>rd</sup> July 2014**

## **Hackney Carriage and Private Hire Licence Fees**

### **1. Purpose of Report and Recommendations**

- 1.1** The purpose of this report is to seek approval from Members for the proposed new hackney carriage and private hire licence fees.
- 1.2** A review of the hackney carriage and private hire licensing service came as a direct result of a formal recommendation made by the Audit Commission following an objection to the Council's accounts, and a resolution by Full Council in November 2011. The purpose of this report is to advise Members of the results of the aforementioned review and subsequent changes made to management staffing levels and operating procedures.
- 1.3** **Members are asked to consider the report on the review of fees for licensed drivers, vehicles and operators and to approve the following recommendations;**
  - a) That Members approve the method of calculation of the proposed fees for hackney carriage and private hire licences.**
  - b) That Members approve the fees suggested for the hackney carriage and private hire licensing function, as shown in Appendix B.**

### **2. Background**

- 2.1** Following an objection to the Council's accounts by the taxi trade, the Audit Commission recommended in his letter dated August 2011 that a fundamental review of taxi licence processes in Barnsley, including a full review of fees be carried out.
- 2.2** The Authority accepted the Auditor's recommendations at the Full Council meeting on the 3<sup>rd</sup> November 2011 and agreed that they would be considered, and a review carried out. The review of the previous year's fees confirmed that the Council had not over-recovered fees and therefore there was no requirement to consider any refunds.
- 2.3** The review process has been ongoing in consultation with the taxi trade, culminating in changes to processes and procedures. Detailed time monitoring has also been carried out, which has informed a full review of the fees.
- 2.4** Various changes to processes are to be introduced this year as part of the implementation of the review. This includes an optional 12 months or 3 yearly licence for drivers, and 12 months or 5 yearly licences for operators. A risk based approach to vehicle testing is to be introduced, and vehicle testing is to be no longer limited to Smithies Depot, but will allow for vehicles to be tested at an approved Vehicle and Operator Services Agency (VOSA) test station.
- 2.5** As these are new processes, assumptions have had to be made as to the amount of work ongoing over the next couple of years. These assumptions are based on current information and on proposed working methods going forward. As these assumptions

have not yet been tested, full time monitoring will continue to be carried out in order for the fees to be reviewed and adjusted accordingly in future, if necessary.

- 2.6 Assumptions as to the actual time spent on the proposed new processes have been calculated using experience of the time taken for current activities. This is the best estimate possible in this situation. An assumption as to the numbers of applicants has been made based on current numbers of licences issued. Whilst members of the trade may surrender their licence throughout the year, there are also new applicants, and overall numbers of licences issued tend not to fluctuate too much, therefore it is felt that this is a representative figure to use.
- 2.7 A new area of work for the Licensing Team moving forward will be the suspension of vehicle licences. Currently this activity is carried out by officers at Smithies Depot, but once this activity is opened out to VOSA approved testing stations, the responsibility for this will be passed to officers within the Licensing service. Assumptions with regards to the potential number of suspensions which will need to be issued are based on current failure rates at Smithies Depot, as shown in Appendix C. This failure rate may change as the vehicle testing is outsourced, as garages may have the ability to carry out repairs on site, such that the vehicle then achieves a pass and does not require the issue of a suspension notice. However, this will be balanced by the additional suspensions generated from proposed extra enforcement work. As these are currently an unknown quantity, they have not been included in the assumed failure rate.
- 2.8 Allowing other MOT test stations to carry out vehicle testing will provide more freedom and flexibility to the taxi trade. However, as the Council has a statutory duty to ensure all licensed vehicles are safe and well regulated, additional enforcement is required to ensure such vehicles are properly tested and safe. Therefore a programme of enforcement operations is proposed, utilising both Licensing and Smithies Depot staff.
- 2.9 It should be noted that the cost of enforcing against drivers is not recoverable in fees and must be borne by the Council.

### **3. Current Position**

- 3.1 Current fees are summarised in Table 1, (at 4.10 in this report).
- 3.2 The review of hackney carriage and private hire fees is as a direct result of the recommendation made by the Audit Commission to undertake a review of taxi licensing following an objection to the Council's accounts and a resolution of full Council in November 2011.
- 3.3 Fees have had to be re-calculated to accurately reflect costs following changes to working practices brought in by the review of processes and procedures, and to reflect changes in staffing levels since the current fees were adopted.
- 3.4 The proposed fees are based on best estimates as to the time taken to carry out the relevant procedures and formalities. Only this cost can be recovered.

#### **4. Proposal**

- 4.1** The Council is the licensing authority for the purposes of hackney carriage and private hire licensing. Its functions and responsibilities in relation to fees and charges for taxi and private hire licences are set out in Sections 53 and 70 of the Local Government (Miscellaneous Provisions) Act 1976 (LG(MP)A 1976).
- 4.2** Schedule 1 to The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) (The Regulations) allocates responsibility for some of those fee setting functions to the Council.
- 4.3** Section 101 of the Local Government Act 1972 allows the Council to delegate those licensing functions which are allocated to it by virtue of the Regulations. The Council has delegated responsibility to the General Licensing Regulatory Board (GLRB) under its Scheme of Delegation within the Council's Constitution to set hackney carriage and private hire licensing fees subject to it taking into account policy considerations of Cabinet and or Council.
- 4.4** Section 70 of the LG(MP)A 1976 permits the Council to set *vehicle and operator* licence fees, but where this fee exceeds £25, under section 70(4) a public notice of the proposed fees must be advertised in a local newspaper circulating in the borough. The advertisement must advise where any objections to the fee changes can be lodged and must allow a period of at least 28 days from publication of the notice for objections to be lodged. If no objections are made or if all objections are withdrawn the proposed fees come into effect at the end of the 28 day period. Where objections are not withdrawn, the Council (i.e. GLRB) must then consider the objections before determining the fee level and setting a further date, not later than two months after the first specified date, on which the new fees shall come into force.
- 4.5** In relation to taxi *drivers'* licence application fees, under section 53 of the LGMPA 1976 there is no statutory requirement to publicise any changes in the level of fees. However, as with the vehicle and operator licence fees, it is not uncommon to publish details of the proposed fees and provide for a period of 28 days from publication for any objections to the fees to be lodged with the Council. Any such objections will be considered by the Council (i.e. GLRB) before the proposed fees are finally approved.
- 4.6** The Council published its fee proposals (for all taxi licences) on the 2 May 2014 with a 28 day consultation period expiring on the 30 May 2014.
- 4.7** Any application for a licence must be accompanied by a fee. The fee is set locally, having regard to guidance issued by the Home Office. In calculating the fees, we have taken into account:
  - All the activity required for processing and granting a licence e.g. considering applications and assessing the suitability of the applicant
  - Staff costs associated with supporting the service
  - Support provided by other parts of the Council to the Licensing Team, e.g. Legal Services and any other associated recharges
  - Carrying out inspections and ensuring compliance with the law
  - Issuing the Licence

- Management costs
- 4.8 These costs are based on assumptions in some cases, and although they are best estimates given the information currently provided, actual figures may differ. We will therefore carry out full time recording of activity moving forward. This also means we will need to review the fees on a regular basis, and within the next 12 months.
- 4.9 Enforcement costs must be based on the principles of good regulation and set out in an open and transparent way. Fees cannot be used for enforcement action against drivers, as an economic deterrent or to raise funds.
- 4.10 Table 1 below shows the detailed breakdown for the proposed fees.

**Table 1 – Current and Proposed fees**

Licence	Type	Current fee	Proposed fee 2014/15	Change( +increase, -decrease compared to current fees)
Driver	1 year	£132 new £82 renewal	£137	+£5 for new licences +£55 for renewals
	3 years	n/a	£221	-£25 (compared to current cost of 3 renewals)
Operator	1 year	£400 new £320 renewal	£63	-£337 for new licences -£257 for renewals
	5 years	n/a	£127	-£ 1473 (compared to current cost of 5 renewals)
Vehicle	Private hire 1 year	£140 under 5 yrs £231 over 5 yrs	£164 All vehicles	+£24 under 5 years old -£67 over 5 years old
	Hackney 1 year	£150 under 5 yrs £240 over 5 yrs	£164 All vehicles	+£15 for under 5 yrs old -£76 for over 5 yrs old

- 4.11 The fees are to be set locally, based on costs incurred. The fees must be determined by the Council, and must be robust so as not to attract legal challenges. It is proposed that the attached fees, as shown in Appendix B and in the table above, be adopted, and reviewed at regular intervals.
- 4.12 Whilst the fees charged by the Council in relation to taxi licensing are discretionary, this does not prevent the Council from charging such fees as it considers reasonable in recovering its costs related to the licensing regime. Indeed the Council should be recovering its costs incurred otherwise the burden could fall upon the local tax payers.
- 4.13 In relation to licensing enforcement costs that cannot be met from licensing fees; these relate to driver enforcement costs. Section 53(2) of the LG (MP) Act 1976 does not appear to make provision for the recovery of any costs by a council in connection with ongoing administration or enforcement in relation to driver licences. Therefore, these costs have not been included in the calculation of the fees.

- 4.14** The Council can confirm that;
- a) it has not over-recovered fees from the taxi trade in recent years and as such there is no need to consider any refunds; (see as stated within the report submitted and approved by Full Council on the 28<sup>th</sup> February 2013, minute number 3.3 "Firstly, the Council confirmed that it has not over-recovered fees from the taxi trade in recent years and therefore there is no need to consider any refunds". ) and
  - b) the review of fees has now been carried out based on the cost and time spent in relation to taxi activities to show a breakdown of what the licensing fee comprises of.
- 4.15** Consultations have taken place with representatives from Finance, Legal and Internal Audit who have confirmed the methodology used and the fees calculated are reasonable (see Appendix A report from Audit).
- 4.16** The licence fees, if approved, will be set at £63 for 1 year, £127 for 5 years for operators (92 current operators) and £137 for one year, £221 for 3 years for drivers (910 current drivers). Five/three year licences will be optional; they will cover a 5/3 year period with the fee paid in year 1, which would generate income on a 5/3 yearly cycle. It is assumed that the majority of drivers and operators will go for the longer option due to the savings to be made against single year licences over the same time scale. There are no options for interim period licences; only 1 or 5 for operators and 1 or 3 for drivers.
- 4.17** Vehicle licences will be issued yearly (currently 605 vehicles licensed). A flat fee of £164 will be payable for all vehicles, irrespective of age, which is fairer than the current system (currently fees are charged based on the age of the vehicle, with older vehicles paying more). The number of vehicle tests required will be determined using a risk based approach.
- 4.18** Income generated by the new fees is expected to be approximately £169K per annum which is roughly in line with the estimated costs of £174K, however, this does assume that all current drivers, operators and vehicles continue to be licensed, and that they will take advantage of the savings to be made by obtaining 3 or 5 year licences where relevant. Therefore, on this basis the new fees will generate enough income to cover anticipated expenditure; however, any change in the level of licences issued will see income levels increase or decrease accordingly.
- 4.19** The actual fee income compared to cost incurred will be reviewed over a five year rolling period. Any net surplus or deficit over the period will be considered as part of future fee setting reviews.
- 4.20** It is anticipated that the fees will be reviewed in July 2015 on the back of ongoing time monitoring analysis, and therefore the anticipated level of income generated in the 2016/17 financial year will be the subject of a further report.

## **5. Results of the Consultation**

- 5.1** Regulatory Services have been working closely with the trade via the Trade Liaison Group throughout the entire review and therefore changes have been communicated to the taxi trade as and when they have been implemented.

- 5.2** Legislation (sec 70 LG (MP) A76 requires that a period of statutory consultation (28 days) is carried out prior to any increases to fees. Representations made during the consultation period must then be considered within another 28 days before any changes are implemented. The proposed new fees were advertised in the Barnsley Chronicle, and all current licence holders were informed of the proposals by letter.
- 5.3** Three objections were received, from 2 objectors, one of whom was representing the various taxi associations and a local taxi firm, the other being a representative of the independent taxi sector. One objection related to the correct route for approval of the fees (which is now clarified as being delegated to the GLRB as described in this report.) The other 2 objections related to detailed issues with regards to alleged overcharging, double charging and querying the methodology used to calculate the fees. (See Appendix D for copies of the objections).
- 5.4** Officers have considered the objections, and consultation has been carried out with Finance and Audit, who have confirmed that they approve the methodology and the fees calculated and can find no evidence of double/overcharging.
- 5.5** A meeting was held with the objectors, Regulatory Services, Audit and Finance to discuss the issues raised and answer the queries. With regards to the allegation that the correct procedure had not been followed for adoption of the fees, Legal advice states that this is a procedural issue which is not relevant to the consideration of objections to the fees. The role of the GLRB in approving the proposed fees is recognised. With regards to the objections to the fees themselves, discussions were held on the detail of the objections.
- 5.6** The conclusions of the meeting were that the proposed operator and vehicle licence fees were agreed; however no agreement was reached with regards to the driver licence fees, with the objector's view that the increase in fees is not justified. The main basis for this argument was that the time monitoring information used was out of date, and that the time allocated for years 2 and 3 of the fee was unreasonable. Whilst this is recognised that the time monitoring information is not recent, both Internal Audit and Finance have agreed that the use of this information is acceptable subject to ongoing up to date time monitoring being carried out to inform future reviews of fees. With regards to the time allocated for years 2 and 3, this has been reviewed further to the comments made at the meeting but it is held to be reasonable as an average.
- 5.6** Following consideration, it was felt that the increase in driver licence fees was justifiable and there were no points raised in consultation which would result in material changes to the proposed fees.
- 5.7** **In conclusion, it is for the GLRB to consider the objections made and come to a decision regarding the fees. Changes may be made to the fees following consultation, or on further consideration of the objections, they may stay the same.**



**6. Background Papers**

Appendix A – Report from Audit

Appendix B – Fees

Appendix C – Taxi Vehicle failure rates (current)

Appendix D – Copies of Objections

Copy of Act - available on request

Details of background calculations are available to Members on request.

**Background Papers are available for inspection in the Licensing Office,  
Westgate Barnsley.**

**7. Officer Contact**

**Caroline Petty**

**Group Leader Pollution and Licensing**

**Regulatory Services**

**BARNSLEY METROPOLITAN BOROUGH COUNCIL  
CORPORATE SERVICES DIRECTORATE  
(FINANCE, PROPERTY AND INFORMATION SERVICES)**

To:	Assistant Director, Culture & Regulation	From:	Head of Internal Audit and Risk Management
Your Ref:		My Ref:	
Enquiries to:	John White	Ext:	3183
Date:	11 <sup>th</sup> April 2014		

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**Subject: Taxi Licence Review 2013/14**

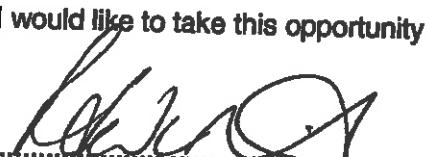
Further to my previous memorandum dated 14<sup>th</sup> November 2013 in respect of the taxi licence review conducted in the Autumn of 2013, a further review has now been completed on the proposed new hackney carriage and private hire licence fees. This review formed part of a planned programme of systems work and links to the Council's priorities as outlined within the Corporate Plan for 2012-15 in terms of growing the economy, value for money and the protection of the people who live, work, trade or visit the borough.

The review involved an examination of the licence fee calculation including the eligibility of the costs included, the methodology of apportioning the costs and confirmation on the arithmetical accuracy of the proposed fees. The review did not seek to examine all records and information and can only consequently provide reasonable rather than absolute assurance.

Based on the sample testing undertaken, our evaluation has concluded that:-

1. The costs used in the calculation appear to be eligible for inclusion and that the costs were based upon the latest financial figures available at the time the fees were calculated in January 2014.
2. Staff costs used in the calculation have been included in accordance with the results of the time analysis exercise carried out between June 2011 and July 2012. However, owing to the period used for the time analysis we recommend that management undertake a subsequent review of the costings to ensure that the proposed fees continue to accurately reflect the costs incurred and remain sufficient and reasonable.
3. Non-staff costs included in this calculation are comprehensive and the assumptions behind the apportionment of these costs appear reasonable.
4. The calculation of the taxi licence fees is arithmetically correct and based upon the work carried out should be sufficient to cover the reasonable costs incurred by the Council in respect of taxi licensing.

I would like to take this opportunity to express my thanks to staff for their assistance during this audit.

  
.....  
Rob Winter  
Head of Internal Audit and Risk Management

**Email copies to:**

- S. Frow, Head of Regulatory Services
- C. Petty, Group Leader (Pollution & Licensing)
- N. Copley, Assistant Director Finance
- A. Hunt, Principal Corporate Risk Management Officer



## Appendix B

### 2014/15 Taxi Fees Summary

**Driver Licence fee (1 year) = £137**

**Driver Licence fee (3 years) = £221**

**(new fee savings for a yearly licence;**

**yearly fee of £137x3 = £411**

**£411 - new 3 year fee of £221 = saving of £190)**

**Operator Licence fee (1 year) = £63**

**Operator Licence fee (5 years) = £127**

**(new fee savings for a 5 year licence;**

**yearly fee of £63x5 = £315**

**£315 - new 5 year fee of £127 = saving of £188)**

**Vehicle Licence fee = £164 a year**

**Current fees:**

**Driver** = £132 for a dual badge for new drivers (pro rata), £82 renewal for existing drivers

**Operator** = £400 for new operators (£320 for renewal for existing operators)

**Vehicle** =

Private hire –

£140 under 5 years or

£77x3 = £231 for vehicles over 5 years

Hackney –

£150 under 5 years or

£80x3 = £240 for vehicles over 5 years

**Summary comparison of fees 13/14 to 14/15;**

Driver licence fee - slight increase on 13/14 unless 3 year licence purchased, then a saving.

Operator fee - decrease on 13/14

Vehicle fee - increase for vehicles under 5 years, decrease for vehicles over 5 years.

# APPENDIX C

## Private Hire/Hackney Carriage Failures 1st April 2013 to 31st August 2013

Description of failure		Total	%
Body & Structure	Hackney& P.Hire	12	2.2
Brakes	Hackney& P.Hire	102	19.1
Driver's view of road	Hackney& P.Hire	20	3.7
Fuel & Emissions	Hackney& P.Hire	71	13.3
HC/PH related items	Hackney& P.Hire	20	3.7
Lighting & Signalling	Hackney& P.Hire	100	18.7
Registration Plates	Hackney& P.Hire	8	1.5
Road Wheels	Hackney& P.Hire	8	1.5
Seat	Hackney& P.Hire	11	2.1
Steering	Hackney& P.Hire	46	8.6
Suspension	Hackney& P.Hire	93	17.4
Tyres	Hackney& P.Hire	44	8.2
Grand Total	Hackney& P.Hire	535	

Description of failure		Total	%
Body & Structure	Hackney Carriage	2	2.1
Brakes	Hackney Carriage	19	19.6
Driver's view of road	Hackney Carriage	4	4.1
Fuel & Emissions	Hackney Carriage	16	16.5
HC/PH related items	Hackney Carriage	6	6.2
Lighting & Signalling	Hackney Carriage	15	15.5
Registration Plates	Hackney Carriage	3	3.1
Road Wheels	Hackney Carriage	1	1.0
Seat	Hackney Carriage	2	2.1
Steering	Hackney Carriage	8	8.2
Suspension	Hackney Carriage	16	16.5
Tyres	Hackney Carriage	5	5.2
Grand Total	Hackney Carriage	97	

Description of failure		Total	%
Body & Structure	Private Hire	10	2.3
Brakes	Private Hire	83	18.9
Driver's view of road	Private Hire	16	3.7
Fuel & Emissions	Private Hire	55	12.6
HC/PH related items	Private Hire	14	3.2
Lighting & Signalling	Private Hire	85	19.4
Registration Plates	Private Hire	5	1.1
Road Wheels	Private Hire	7	1.6
Seat	Private Hire	9	2.1
Steering	Private Hire	38	8.7
Suspension	Private Hire	77	17.6
Tyres	Private Hire	39	8.9
Grand Total	Private Hire	438	

**NB. Vehicles may have failed on more than one component per test.**





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06/12/2013	Dec	30	10
13/12/2013	Dec	39	16
20/12/2013	Dec	44	26
27/12/2013	Dec	7	4
03/01/2014	Jan	20	6
10/01/2014	Jan	21	0
19/01/2014	Jan	31	14
24/01/2014	Jan	33	18
31/01/2014	Jan	26	8
07/02/2014	Feb	30	7

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26	16	10	8
22	15	14	16
6	3	3	3
16	7	9	9
17	10	7	7
30	19	11	9
29	14	15	15
22	13	9	9
25	18	7	7

	Data	Total
April	First Tests	118
	First Test	56
	Retest 1	57
	Retest 2	5
	Retest 3	0
	Retest 4	0
May	First Tests	114
	First Test	65
	Retest 1	46
	Retest 2	2
	Retest 3	0
	Retest 4	0
June	First Tests	80
	First Test	33
	Retest 1	42
	Retest 2	0
	Retest 3	1
	Retest 4	0
July	First Tests	103
	First Test	43
	Retest 1	54
	Retest 2	0
	Retest 3	0
	Retest 4	0
August	First Tests	149
	First Test	66
	Retest 1	73
	Retest 2	0
	Retest 3	0
	Retest 4	0
September	First Tests	112
	First Test	51
	Retest 1	58
	Retest 2	0
	Retest 3	0
	Retest 4	0
October	First Tests	120
	First Test	65
	Retest 1	55
	Retest 2	0
	Retest 3	0
	Retest 4	0
November	First Tests	85
	First Test	46
	Retest 1	38
	Retest 2	0
	Retest 3	0
	Retest 4	0
December	First Tests	93
	First Test	55
	Retest 1	27
	Retest 2	2
	Retest 3	0
	Retest 4	0
January	First Tests	114
	First Test	63
	Retest 1	49
	Retest 2	0
	Retest 3	0
	Retest 4	0
Total First Tests		1088
Total First Test		543
Total Retest 1		499
Total Retest 2		9
Total Retest 3		1
Total Retest 4		0

Taxi By Month [Copy of fees vehicle failure rates 2013 14]



## Appendix C

### Analysis of Inspections at Smithies, April 2013 to March 2014

## SUMMARY FOR PERIOD

No of Vehicles Requiring Inspection	1088
First Time Pass Rate	50%
Number Undertaking Re-test	516
Number Undertaking Second Re-test	10
Number Undertaking Third Re-test	1
Number Undertaking Fourth Re-test	0
Number Not Returning For Test	30

Taxi Driver Tests = 0  
Missed Appointments = £45.00  
Taxi Tests = £45.00  
Taxi retests = £20.00



Date	P.Hire/Hackney C	Code Component	Description of failure	Fail
02/04/2013	Hackney Carriage	5000	Lighting & Signalling	1
02/04/2013	Private Hire	5000	Lighting & Signalling	1
04/04/2013	Hackney Carriage	5000	Lighting & Signalling	1
04/04/2013	Private Hire	5000	Lighting & Signalling	1
08/04/2013	April	Private Hire	5000	Lighting & Signalling
09/04/2013	April	Private Hire	5000	Lighting & Signalling
10/04/2013	April	Private Hire	5000	Lighting & Signalling
10/04/2013	April	Private Hire	5000	Lighting & Signalling
10/04/2013	April	Private Hire	5000	Lighting & Signalling
11/04/2013	April	Private Hire	5000	Lighting & Signalling
11/04/2013	April	Private Hire	5000	Lighting & Signalling
16/04/2013	April	Hackney Carriage	5000	Lighting & Signalling
17/04/2013	April	Private Hire	5000	Lighting & Signalling
18/04/2013	April	Private Hire	5000	Lighting & Signalling
23/04/2013	April	Private Hire	5000	Lighting & Signalling
29/04/2013	April	Private Hire	5000	Lighting & Signalling
01/05/2013	May	Private Hire	5000	Lighting & Signalling
01/05/2013	May	Private Hire	5000	Lighting & Signalling
02/05/2013	May	Private Hire	5000	Lighting & Signalling
07/05/2013	May	Private Hire	5000	Lighting & Signalling
07/05/2013	May	Private Hire	5000	Lighting & Signalling
08/05/2013	May	Private Hire	5000	Lighting & Signalling
09/05/2013	May	Private Hire	5000	Lighting & Signalling
09/05/2013	May	Private Hire	5000	Lighting & Signalling
09/05/2013	May	Private Hire	5000	Lighting & Signalling
13/05/2013	May	Private Hire	5000	Lighting & Signalling
14/05/2013	May	Private Hire	5000	Lighting & Signalling
14/05/2013	May	Hackney Carriage	5000	Lighting & Signalling
15/05/2013	May	Private Hire	5000	Lighting & Signalling
16/05/2013	May	Private Hire	5000	Lighting & Signalling
20/05/2013	May	Private Hire	5000	Lighting & Signalling
21/05/2013	May	Private Hire	5000	Lighting & Signalling
21/05/2013	May	Private Hire	5000	Lighting & Signalling
23/05/2013	May	Private Hire	5000	Lighting & Signalling
03/06/2013	June	Private Hire	5000	Lighting & Signalling
02/04/2013				1

04/06/2013	Hackney Carriage	5000
04/06/2013	Hackney Carriage	5000
05/06/2013	Private Hire	5000
10/06/2013	Private Hire	5000
11/06/2013	Private Hire	5000
17/06/2013	Private Hire	5000
17/06/2013	Private Hire	5000
19/06/2013	Private Hire	5000
24/06/2013	Hackney Carriage	5000
25/06/2013	Private Hire	5000
30/06/2013	Private Hire	5000
01/07/2013	Private Hire	5000
01/07/2013	Private Hire	5000
01/07/2013	Private Hire	5000
02/07/2013	Private Hire	5000
02/07/2013	Private Hire	5000
09/07/2013	Private Hire	5000
15/07/2013	Private Hire	5000
16/07/2013	Private Hire	5000
23/07/2013	Private Hire	5000
23/07/2013	Private Hire	5000
24/07/2013	Private Hire	5000
29/07/2013	Private Hire	5000
30/07/2013	Private Hire	5000
31/07/2013	Private Hire	5000
01/08/2013	Private Hire	5000
05/08/2013	Hackney Carriage	5000
06/08/2013	Hackney Carriage	5000
06/08/2013	Hackney Carriage	5000
07/08/2013	Private Hire	5000
08/08/2013	Private Hire	5000
08/08/2013	Private Hire	5000
12/08/2013	Private Hire	5000
12/08/2013	Private Hire	5000
13/08/2013	Private Hire	5000



17/09/2013	Private Hire	5000	Lighting & Signalling
17/09/2013	Private Hire	5000	Lighting & Signalling
17/09/2013	Private Hire	5000	Lighting & Signalling
19/09/2013	Private Hire	5000	Lighting & Signalling
23/09/2013	Private Hire	5000	Lighting & Signalling
23/09/2013	Hackney Carriage	5000	Lighting & Signalling
23/09/2013	Private Hire	5000	Lighting & Signalling
23/09/2013	Private Hire	5000	Lighting & Signalling
24/09/2013	Private Hire	5000	Lighting & Signalling
24/09/2013	Private Hire	5000	Lighting & Signalling
25/09/2013	Private Hire	5000	Lighting & Signalling
25/09/2013	Private Hire	5000	Lighting & Signalling
26/09/2013	Private Hire	5000	Lighting & Signalling
26/09/2013	Private Hire	5000	Lighting & Signalling
30/09/2013	Private Hire	5000	Lighting & Signalling
01/10/2013	Private Hire	5000	Lighting & Signalling
01/10/2013	Private Hire	5000	Lighting & Signalling
02/10/2013	Private Hire	5000	Lighting & Signalling
02/10/2013	Private Hire	5000	Lighting & Signalling
03/10/2013	Private Hire	5000	Lighting & Signalling
08/10/2013	Hackney Carriage	5000	Lighting & Signalling
09/10/2013	Private Hire	5000	Lighting & Signalling
10/10/2013	Hackney Carriage	5000	Lighting & Signalling
10/10/2013	Private Hire	5000	Lighting & Signalling
14/10/2013	Private Hire	5000	Lighting & Signalling
16/10/2013	Private Hire	5000	Lighting & Signalling
16/10/2013	Private Hire	5000	Lighting & Signalling
17/10/2013	Private Hire	5000	Lighting & Signalling
17/10/2013	Private Hire	5000	Lighting & Signalling
21/10/2013	Private Hire	5000	Lighting & Signalling
21/10/2013	Private Hire	5000	Lighting & Signalling
22/10/2013	Private Hire	5000	Lighting & Signalling
28/10/2013	Private Hire	5000	Lighting & Signalling
28/10/2013	October	5000	Lighting & Signalling



12/12/2013	Private Hire	5000	Lighting & Signalling
16/12/2013	Hackney Carriage	5000	Lighting & Signalling
16/12/2013	Private Hire	5000	Lighting & Signalling
16/12/2013	Hackney Carriage	5000	Lighting & Signalling
17/12/2013	Private Hire	5000	Lighting & Signalling
17/12/2013	Hackney Carriage	5000	Lighting & Signalling
18/12/2013	Private Hire	5000	Lighting & Signalling
18/12/2013	Hackney Carriage	5000	Lighting & Signalling
19/12/2013	Private Hire	5000	Lighting & Signalling
23/12/2013	Private Hire	5000	Lighting & Signalling
02/01/2014	Hackney Carriage	5000	Lighting & Signalling
03/01/2014	Private Hire	5000	Lighting & Signalling
03/01/2014	Private Hire	5000	Lighting & Signalling
06/01/2014	Hackney Carriage	5000	Lighting & Signalling
07/01/2014	Private Hire	5000	Lighting & Signalling
08/01/2014	Private Hire	5000	Lighting & Signalling
13/01/2014	Private Hire	5000	Lighting & Signalling
13/01/2014	Hackney Carriage	5000	Lighting & Signalling
13/01/2014	Private Hire	5000	Lighting & Signalling
14/01/2014	Private Hire	5000	Lighting & Signalling
21/01/2014	Private Hire	5000	Lighting & Signalling
21/01/2014	Hackney Carriage	5000	Lighting & Signalling
21/01/2014	Private Hire	5000	Lighting & Signalling
21/01/2014	Private Hire	5000	Lighting & Signalling
21/01/2014	Hackney Carriage	5000	Lighting & Signalling
22/01/2014	Private Hire	5000	Lighting & Signalling
22/01/2014	Private Hire	5000	Lighting & Signalling
23/01/2014	Hackney Carriage	5000	Lighting & Signalling
23/01/2014	Private Hire	5000	Lighting & Signalling
27/01/2014	Private Hire	5000	Lighting & Signalling
27/01/2014	Hackney Carriage	5000	Lighting & Signalling
27/01/2014	Private Hire	5000	Lighting & Signalling
29/01/2014	Private Hire	5000	Lighting & Signalling
03/02/2014	Hackney Carriage	5000	Lighting & Signalling
03/02/2014	Private Hire	5000	Lighting & Signalling
03/02/2014	Private Hire	5000	Lighting & Signalling
03/02/2014	Hackney Carriage	5000	Lighting & Signalling
03/02/2014	Private Hire	5000	Lighting & Signalling
03/02/2014	Private Hire	5000	Lighting & Signalling
03/02/2014	Hackney Carriage	5000	Lighting & Signalling
05/02/2014	Private Hire	5000	Lighting & Signalling
10/02/2014	Private Hire	5000	Lighting & Signalling
10/02/2014	Hackney Carriage	5000	Lighting & Signalling
13/02/2014	Private Hire	5000	Lighting & Signalling
02/04/2013	Private Hire	5100	Steering

02/04/2013	April	Hackney Carriage	5100	Steering
03/04/2013	April	Private Hire	5100	Steering
03/04/2013	April	Private Hire	5100	Steering
05/04/2013	April	Private Hire	5100	Steering
05/04/2013	April	Private Hire	5100	Steering
08/04/2013	April	Private Hire	5100	Steering
08/04/2013	April	Private Hire	5100	Steering
08/04/2013	April	Private Hire	5100	Steering
09/04/2013	April	Private Hire	5100	Steering
09/04/2013	April	Private Hire	5100	Steering
09/04/2013	April	Private Hire	5100	Steering
09/04/2013	April	Private Hire	5100	Steering
12/04/2013	April	Private Hire	5100	Steering
15/04/2013	April	Private Hire	5100	Steering
15/04/2013	April	Private Hire	5100	Steering
16/04/2013	April	Private Hire	5100	Steering
18/04/2013	April	Private Hire	5100	Steering
23/04/2013	April	Private Hire	5100	Steering
23/04/2013	April	Private Hire	5100	Steering
01/05/2013	May	Private Hire	5100	Steering
08/05/2013	May	Private Hire	5100	Steering
08/05/2013	May	Private Hire	5100	Steering
20/05/2013	May	Private Hire	5100	Steering
21/05/2013	May	Private Hire	5100	Steering
21/05/2013	May	Hackney Carriage	5100	Steering
21/05/2013	May	Private Hire	5100	Steering
29/05/2013	June	Private Hire	5100	Steering
29/05/2013	June	Hackney Carriage	5100	Steering
03/06/2013	June	Private Hire	5100	Steering
04/06/2013	June	Private Hire	5100	Steering
05/06/2013	June	Private Hire	5100	Steering
06/06/2013	June	Private Hire	5100	Steering
17/06/2013	June	Private Hire	5100	Steering
24/06/2013	June	Hackney Carriage	5100	Steering
24/06/2013	June	Hackney Carriage	5100	Steering
25/06/2013	June	Private Hire	5100	Steering
04/07/2013	July	Private Hire	5100	Steering
24/07/2013	July	Private Hire	5100	Steering
29/07/2013	July	Private Hire	5100	Steering

31/07/2013	July	Private Hire	5100	Steering
06/08/2013	August	Private Hire	5100	Steering
12/08/2013	August	Hackney Carriage	5100	Steering
13/08/2013	August	Private Hire	5100	Steering
20/08/2013	August	Private Hire	5100	Steering
22/08/2013	August	Private Hire	5100	Steering
27/08/2013	August	Private Hire	5100	Steering
27/08/2013	August	Hackney Carriage	5100	Steering
27/08/2013	August	Private Hire	5100	Steering
02/09/2013	September	Hackney Carriage	5100	Steering
10/09/2013	September	Private Hire	5100	Steering
11/09/2013	September	Private Hire	5100	Steering
23/09/2013	September	Private Hire	5100	Steering
26/09/2013	September	Private Hire	5100	Steering
30/09/2013	September	Private Hire	5100	Steering
01/10/2013	October	Private Hire	5100	Steering
01/10/2013	October	Hackney Carriage	5100	Steering
01/10/2013	October	Private Hire	5100	Steering
03/10/2013	October	Private Hire	5100	Steering
07/10/2013	October	Private Hire	5100	Steering
08/10/2013	October	Hackney Carriage	5100	Steering
10/10/2013	October	Private Hire	5100	Steering
10/10/2013	October	Hackney Carriage	5100	Steering
10/10/2013	October	Private Hire	5100	Steering
21/10/2013	October	Private Hire	5100	Steering
21/10/2013	October	Hackney Carriage	5100	Steering
21/10/2013	October	Private Hire	5100	Steering
29/10/2013	October	Private Hire	5100	Steering
29/10/2013	October	Hackney Carriage	5100	Steering
29/10/2013	November	Private Hire	5100	Steering
05/11/2013	November	Hackney Carriage	5100	Steering
06/11/2013	November	Private Hire	5100	Steering
19/11/2013	November	Hackney Carriage	5100	Steering
20/11/2013	November	Private Hire	5100	Steering
28/11/2013	November	Private Hire	5100	Steering

09/12/2013	Private Hire	5100
10/12/2013	Private Hire	5100
12/12/2013	Private Hire	5100
19/12/2013	Private Hire	5100
23/12/2013	Private Hire	5100
02/01/2014	Private Hire	5100
02/01/2014	Hackney Carriage	5100
02/01/2014	Steering	1
14/01/2014	Private Hire	5100
14/01/2014	Hackney Carriage	5100
14/01/2014	Steering	1
15/01/2014	Private Hire	5100
15/01/2014	Hackney Carriage	5100
15/01/2014	Steering	1
22/01/2014	Private Hire	5100
29/01/2014	Private Hire	5100
10/02/2014	Private Hire	5100
11/02/2014	Private Hire	5100
02/04/2013	Private Hire	5100
02/04/2013	Hackney Carriage	5190
02/04/2013	Steering	1
03/04/2013	Private Hire	5190
04/04/2013	Private Hire	5190
04/04/2013	Hackney Carriage	5190
04/04/2013	Steering	1
08/04/2013	Private Hire	5190
09/04/2013	Private Hire	5190
09/04/2013	Hackney Carriage	5190
09/04/2013	Steering	1
09/04/2013	Private Hire	5190
11/04/2013	Private Hire	5190
16/04/2013	Private Hire	5190
18/04/2013	Private Hire	5190
19/04/2013	Private Hire	5190
22/04/2013	Private Hire	5190
23/04/2013	Hackney Carriage	5190
23/04/2013	Steering	1
29/04/2013	Private Hire	5190
02/05/2013	Private Hire	5190
02/05/2013	Hackney Carriage	5190
02/05/2013	Steering	1
03/05/2013	Private Hire	5190
03/05/2013	Private Hire	5190
07/05/2013	Private Hire	5190
07/05/2013	Hackney Carriage	5190
07/05/2013	Steering	1

08/05/2013	May	Private Hire	5190
09/05/2013	May	Private Hire	5190
13/05/2013	May	Hackney Carriage	5190
14/05/2013	May	Private Hire	5190
14/05/2013	May	Private Hire	5190
16/05/2013	May	Private Hire	5190
20/05/2013	May	Private Hire	5190
21/05/2013	May	Hackney Carriage	5190
28/05/2013	May	Private Hire	5190
29/05/2013	May	Private Hire	5190
29/05/2013	June	Private Hire	5190
03/06/2013	June	Private Hire	5190
03/06/2013	June	Hackney Carriage	5190
04/06/2013	June	Private Hire	5190
05/06/2013	June	Private Hire	5190
17/06/2013	June	Private Hire	5190
17/06/2013	June	Private Hire	5190
18/06/2013	June	Private Hire	5190
19/06/2013	June	Private Hire	5190
19/06/2013	June	Private Hire	5190
24/06/2013	June	Hackney Carriage	5190
25/06/2013	July	Private Hire	5190
01/07/2013	July	Private Hire	5190
01/07/2013	July	Hackney Carriage	5190
08/07/2013	July	Private Hire	5190
08/07/2013	July	Private Hire	5190
09/07/2013	July	Private Hire	5190
10/07/2013	July	Private Hire	5190
10/07/2013	July	Private Hire	5190
17/07/2013	July	Private Hire	5190
17/07/2013	July	Hackney Carriage	5190
22/07/2013	July	Private Hire	5190
23/07/2013	July	Private Hire	5190
24/07/2013	July	Private Hire	5190
24/07/2013	July	Private Hire	5190

July	29/07/2013	Private Hire	5190
July	30/07/2013	Hackney Carriage	5190
July	31/07/2013	Private Hire	5190
July	01/08/2013	Hackney Carriage	5190
August	02/08/2013	Private Hire	5190
August	03/08/2013	Hackney Carriage	5190
August	04/08/2013	Private Hire	5190
August	05/08/2013	Hackney Carriage	5190
August	06/08/2013	Private Hire	5190
August	07/08/2013	Hackney Carriage	5190
August	08/08/2013	Private Hire	5190
August	09/08/2013	Hackney Carriage	5190
August	10/08/2013	Private Hire	5190
August	11/08/2013	Hackney Carriage	5190
August	12/08/2013	Private Hire	5190
August	13/08/2013	Hackney Carriage	5190
August	14/08/2013	Private Hire	5190
August	15/08/2013	Hackney Carriage	5190
August	16/08/2013	Private Hire	5190
August	17/08/2013	Hackney Carriage	5190
August	18/08/2013	Private Hire	5190
August	19/08/2013	Hackney Carriage	5190
August	20/08/2013	Private Hire	5190
August	21/08/2013	Hackney Carriage	5190
August	22/08/2013	Private Hire	5190
August	23/08/2013	Hackney Carriage	5190
August	24/08/2013	Private Hire	5190
August	25/08/2013	Hackney Carriage	5190
September	26/08/2013	Private Hire	5190
September	27/08/2013	Hackney Carriage	5190
September	28/08/2013	Private Hire	5190
September	29/08/2013	Hackney Carriage	5190
September	30/08/2013	Private Hire	5190
September	31/08/2013	Hackney Carriage	5190

02/09/2013	Private Hire	5190	Suspension
03/09/2013	Private Hire	5190	Suspension
11/09/2013	Private Hire	5190	Suspension
12/09/2013	Private Hire	5190	Suspension
16/09/2013	Private Hire	5190	Suspension
16/09/2013	Private Hire	5190	Suspension
16/09/2013	Hackney Carriage	5190	Suspension
17/09/2013	Hackney Carriage	5190	Suspension
17/09/2013	Private Hire	5190	Suspension
19/09/2013	Private Hire	5190	Suspension
23/09/2013	Private Hire	5190	Suspension
24/09/2013	Private Hire	5190	Suspension
26/09/2013	Private Hire	5190	Suspension
26/09/2013	Private Hire	5190	Suspension
26/09/2013	Private Hire	5190	Suspension
30/09/2013	Private Hire	5190	Suspension
01/10/2013	Private Hire	5190	Suspension
01/10/2013	Hackney Carriage	5190	Suspension
03/10/2013	Private Hire	5190	Suspension
07/10/2013	Private Hire	5190	Suspension
08/10/2013	Private Hire	5190	Suspension
10/10/2013	Private Hire	5190	Suspension
10/10/2013	Private Hire	5190	Suspension
10/10/2013	Hackney Carriage	5190	Suspension
16/10/2013	Private Hire	5190	Suspension
16/10/2013	Private Hire	5190	Suspension
17/10/2013	Private Hire	5190	Suspension
17/10/2013	Private Hire	5190	Suspension
21/10/2013	Private Hire	5190	Suspension
21/10/2013	Hackney Carriage	5190	Suspension
22/10/2013	Hackney Carriage	5190	Suspension
23/10/2013	Private Hire	5190	Suspension
28/10/2013	Private Hire	5190	Suspension
28/10/2013	Hackney Carriage	5190	Suspension
29/10/2013	Private Hire	5190	Suspension
07/11/2013	Private Hire	5190	Suspension



06/01/2014	January	Hackney Carriage	5190	Suspension
08/01/2014	January	Private Hire	5190	Suspension
13/01/2014	January	Private Hire	5190	Suspension
14/01/2014	January	Private Hire	5190	Suspension
14/01/2014	January	Hackney Carriage	5190	Suspension
15/01/2014	January	Hackney Carriage	5190	Suspension
20/01/2014	January	Private Hire	5190	Suspension
20/01/2014	January	Hackney Carriage	5190	Suspension
21/01/2014	January	Private Hire	5190	Suspension
21/01/2014	January	Private Hire	5190	Suspension
23/01/2014	January	Private Hire	5190	Suspension
30/01/2014	January	Private Hire	5190	Suspension
03/02/2014	February	Private Hire	5190	Suspension
05/02/2014	February	Hackney Carriage	5190	Suspension
10/02/2014	February	Private Hire	5190	Suspension
10/02/2014	February	Hackney Carriage	5190	Suspension
11/02/2014	February	Private Hire	5190	Suspension
12/02/2014	February	Private Hire	5190	Suspension
02/04/2013	April	Private Hire	5430	Brakes
02/04/2013	April	Hackney Carriage	5430	Brakes
02/04/2013	April	Hackney Carriage	5430	Brakes
03/04/2013	April	Private Hire	5430	Brakes
05/04/2013	April	Private Hire	5430	Brakes
08/04/2013	April	Private Hire	5430	Brakes
08/04/2013	April	Private Hire	5430	Brakes
08/04/2013	April	Private Hire	5430	Brakes
09/04/2013	April	Private Hire	5430	Brakes
09/04/2013	April	Private Hire	5430	Brakes
10/04/2013	April	Private Hire	5430	Brakes
11/04/2013	April	Private Hire	5430	Brakes
12/04/2013	April	Private Hire	5430	Brakes
12/04/2013	April	Private Hire	5430	Brakes
15/04/2013	April	Private Hire	5430	Brakes
16/04/2013	April	Hackney Carriage	5430	Brakes
17/04/2013	April	Private Hire	5430	Brakes
18/04/2013	April	Private Hire	5430	Brakes

18/04/2013	Private Hire	5430
19/04/2013	Private Hire	5430
22/04/2013	Hackney Carriage	5430
24/04/2013	Private Hire	5430
26/04/2013	Hackney Carriage	5430
26/04/2013	Hackney Carriage	5430
01/05/2013	Private Hire	5430
02/05/2013	Hackney Carriage	5430
07/05/2013	Private Hire	5430
08/05/2013	Private Hire	5430
08/05/2013	Private Hire	5430
09/05/2013	Private Hire	5430
14/05/2013	Hackney Carriage	5430
14/05/2013	Private Hire	5430
16/05/2013	Private Hire	5430
20/05/2013	Private Hire	5430
28/05/2013	Private Hire	5430
03/06/2013	Private Hire	5430
03/06/2013	Private Hire	5430
03/06/2013	Private Hire	5430
04/06/2013	Private Hire	5430
04/06/2013	Private Hire	5430
04/06/2013	Hackney Carriage	5430
05/06/2013	Private Hire	5430
11/06/2013	Private Hire	5430
12/06/2013	Hackney Carriage	5430
17/06/2013	Hackney Carriage	5430
17/06/2013	Private Hire	5430
18/06/2013	Private Hire	5430
24/06/2013	Hackney Carriage	5430
25/06/2013	Private Hire	5430
26/06/2013	Private Hire	5430
01/07/2013	Private Hire	5430

01/07/2013	July	Private Hire	5430
02/07/2013	July	Private Hire	5430
02/07/2013	July	Private Hire	5430
04/07/2013	July	Private Hire	5430
04/07/2013	July	Private Hire	5430
04/07/2013	July	Brakes	Brakes
08/07/2013	July	Private Hire	5430
09/07/2013	July	Private Hire	5430
10/07/2013	July	Private Hire	5430
15/07/2013	July	Private Hire	5430
15/07/2013	July	Brakes	Brakes
16/07/2013	July	Private Hire	5430
17/07/2013	July	Private Hire	5430
22/07/2013	July	Hackney Carriage	5430
23/07/2013	July	Private Hire	5430
29/07/2013	July	Private Hire	5430
29/07/2013	July	Brakes	Brakes
30/07/2013	July	Private Hire	5430
30/07/2013	July	Brakes	Brakes
31/07/2013	July	Hackney Carriage	5430
01/08/2013	August	Private Hire	5430
05/08/2013	August	Private Hire	5430
05/08/2013	August	Brakes	Brakes
06/08/2013	August	Hackney Carriage	5430
07/08/2013	August	Private Hire	5430
08/08/2013	August	Private Hire	5430
08/08/2013	August	Brakes	Brakes
08/08/2013	August	Private Hire	5430
12/08/2013	August	Private Hire	5430
12/08/2013	August	Brakes	Brakes
12/08/2013	August	Hackney Carriage	5430
12/08/2013	August	Private Hire	5430
13/08/2013	August	Private Hire	5430
14/08/2013	August	Private Hire	5430
15/08/2013	August	Private Hire	5430
15/08/2013	August	Brakes	Brakes

15/08/2013	August	Hackney Carriage	5430
16/08/2013	August	Private Hire	5430
16/08/2013	August	Private Hire	5430
19/08/2013	August	Private Hire	5430
19/08/2013	August	Private Hire	5430
19/08/2013	August	Private Hire	5430
19/08/2013	August	Private Hire	5430
20/08/2013	August	Private Hire	5430
21/08/2013	August	Private Hire	5430
22/08/2013	August	Private Hire	5430
27/08/2013	August	Private Hire	5430
27/08/2013	August	Private Hire	5430
30/08/2013	August	Private Hire	5430
02/09/2013	September	Private Hire	5430
02/09/2013	September	Private Hire	5430
09/09/2013	September	Private Hire	5430
11/09/2013	September	Private Hire	5430
11/09/2013	September	Private Hire	5430
11/09/2013	September	Private Hire	5430
11/09/2013	September	Private Hire	5430
16/09/2013	September	Private Hire	5430
16/09/2013	September	Hackney Carriage	5430
17/09/2013	September	Private Hire	5430
17/09/2013	September	Private Hire	5430
17/09/2013	September	Hackney Carriage	5430
17/09/2013	September	Private Hire	5430
17/09/2013	September	Private Hire	5430
23/09/2013	September	Private Hire	5430
23/09/2013	September	Hackney Carriage	5430
25/09/2013	September	Private Hire	5430
25/09/2013	September	Private Hire	5430
26/09/2013	September	Private Hire	5430
26/09/2013	September	Hackney Carriage	5430
30/09/2013	October	Private Hire	5430
01/10/2013	October	Private Hire	5430
02/10/2013	October	Private Hire	5430
02/10/2013	October	Private Hire	5430
03/10/2013	October	Private Hire	5430
03/10/2013	October	Private Hire	5430

07/10/2013	Private Hire	5430
07/10/2013	October	Brakes
08/10/2013	October	Brakes
08/10/2013	Hackney Carriage	Brakes
10/10/2013	October	Brakes
10/10/2013	Private Hire	5430
14/10/2013	October	Brakes
14/10/2013	Private Hire	5430
16/10/2013	October	Brakes
16/10/2013	Private Hire	5430
17/10/2013	October	Brakes
17/10/2013	Private Hire	5430
21/10/2013	October	Brakes
21/10/2013	Private Hire	5430
23/10/2013	October	Brakes
23/10/2013	Private Hire	5430
29/10/2013	October	Brakes
29/10/2013	Private Hire	5430
29/10/2013	October	Brakes
29/10/2013	Private Hire	5430
31/10/2013	October	Brakes
31/10/2013	Private Hire	5430
11/11/2013	November	Brakes
11/11/2013	Private Hire	5430
12/11/2013	November	Brakes
12/11/2013	Hackney Carriage	Brakes
18/11/2013	November	Brakes
18/11/2013	Private Hire	5430
19/11/2013	November	Brakes
19/11/2013	Private Hire	5430
19/11/2013	November	Brakes
19/11/2013	Private Hire	5430
20/11/2013	November	Brakes
20/11/2013	Private Hire	5430
21/11/2013	November	Brakes
21/11/2013	Hackney Carriage	Brakes
25/11/2013	November	Brakes
25/11/2013	Private Hire	5430
27/11/2013	November	Brakes
27/11/2013	Private Hire	5430
04/12/2013	December	Brakes
04/12/2013	Private Hire	5430
04/12/2013	December	Brakes
04/12/2013	Private Hire	5430
05/12/2013	December	Brakes
05/12/2013	Private Hire	5430
09/12/2013	December	Brakes
09/12/2013	Private Hire	5430
12/12/2013	December	Brakes
12/12/2013	Private Hire	5430
12/12/2013	December	Brakes
12/12/2013	Private Hire	5430
16/12/2013	December	Brakes
16/12/2013	Private Hire	5430
19/12/2013	December	Brakes
19/12/2013	Private Hire	5430
23/12/2013	December	Brakes
23/12/2013	Private Hire	5430
23/12/2013	January	Brakes
02/01/2014	January	Brakes

03/01/2014	January	Private Hire	5430
09/01/2014	January	Private Hire	5430
13/01/2014	January	Private Hire	5430
13/01/2014	January	Private Hire	5430
14/01/2014	January	Hackney Carriage	5430
15/01/2014	January	Private Hire	5430
21/01/2014	January	Private Hire	5430
21/01/2014	January	Private Hire	5430
23/01/2014	January	Private Hire	5430
23/01/2014	February	Private Hire	5430
27/01/2014	January	Private Hire	5430
05/02/2014	February	Private Hire	5430
06/02/2014	February	Private Hire	5430
10/02/2014	February	Private Hire	5430
12/02/2014	February	Private Hire	5430
02/04/2013	April	Hackney Carriage	5650
04/04/2013	April	Private Hire	5650
08/04/2013	April	Private Hire	5650
10/04/2013	April	Private Hire	5650
11/04/2013	April	Private Hire	5650
01/05/2013	May	Private Hire	5650
02/05/2013	May	Hackney Carriage	5650
02/05/2013	May	Private Hire	5650
16/05/2013	May	Private Hire	5650
16/05/2013	May	Private Hire	5650
20/05/2013	May	Private Hire	5650
21/05/2013	May	Private Hire	5650
29/05/2013	May	Private Hire	5650
03/06/2013	June	Private Hire	5650
03/06/2013	June	Private Hire	5650
05/06/2013	June	Private Hire	5650
07/06/2013	June	Private Hire	5650
11/06/2013	June	Private Hire	5650
20/06/2013	June	Private Hire	5650
24/06/2013	June	Hackney Carriage	5650
26/06/2013	June	Private Hire	5650

16/07/2013	Private Hire	5650
16/07/2013	Private Hire	5650
23/07/2013	Private Hire	5650
24/07/2013	Private Hire	5650
29/07/2013	Private Hire	5650
31/07/2013	Private Hire	5650
05/08/2013	Hackney Carriage	5650
06/08/2013	Private Hire	5650
08/08/2013	Private Hire	5650
08/08/2013	Private Hire	5650
08/08/2013	Private Hire	5650
12/08/2013	Private Hire	5650
12/08/2013	Private Hire	5650
14/08/2013	Private Hire	5650
14/08/2013	Private Hire	5650
15/08/2013	Private Hire	5650
20/08/2013	Private Hire	5650
21/08/2013	Hackney Carriage	5650
22/08/2013	Private Hire	5650
27/08/2013	Private Hire	5650
29/08/2013	Private Hire	5650
03/09/2013	Private Hire	5650
11/09/2013	Private Hire	5650
16/09/2013	Private Hire	5650
18/09/2013	Private Hire	5650
23/09/2013	Hackney Carriage	5650
23/09/2013	Private Hire	5650
24/09/2013	Private Hire	5650
24/09/2013	Private Hire	5650
25/09/2013	Private Hire	5650
25/09/2013	Hackney Carriage	5650
25/09/2013	Private Hire	5650
26/09/2013	Private Hire	5650

03/10/2013	Private Hire	5650	Tyres
21/10/2013	Private Hire	5650	Tyres
24/10/2013	Private Hire	5650	Tyres
24/10/2013	Private Hire	5650	Tyres
28/10/2013	Private Hire	5650	Tyres
06/11/2013	Private Hire	5650	Tyres
12/11/2013	Private Hire	5650	Tyres
12/11/2013	Hackney Carriage	5650	Tyres
14/11/2013	Private Hire	5650	Tyres
19/11/2013	Hackney Carriage	5650	Tyres
27/11/2013	Private Hire	5650	Tyres
27/11/2013	Hackney Carriage	5650	Tyres
28/11/2013	Private Hire	5650	Tyres
02/12/2013	Hackney Carriage	5650	Tyres
04/12/2013	Private Hire	5650	Tyres
05/12/2013	Private Hire	5650	Tyres
09/12/2013	Private Hire	5650	Tyres
09/12/2013	Private Hire	5650	Tyres
10/12/2013	Private Hire	5650	Tyres
10/12/2013	Private Hire	5650	Tyres
12/12/2013	Private Hire	5650	Tyres
16/12/2013	Private Hire	5650	Tyres
16/12/2013	Hackney Carriage	5650	Tyres
16/12/2013	Private Hire	5650	Tyres
17/12/2013	Private Hire	5650	Tyres
18/12/2013	Private Hire	5650	Tyres
30/12/2013	Private Hire	5650	Tyres
02/01/2014	Hackney Carriage	5650	Tyres
06/01/2014	Private Hire	5650	Tyres
09/01/2014	Private Hire	5650	Tyres
16/01/2014	Private Hire	5650	Tyres
21/01/2014	Private Hire	5650	Tyres
23/01/2014	Private Hire	5650	Tyres
27/01/2014	Private Hire	5650	Tyres
12/02/2014	Private Hire	5650	Tyres
08/04/2013	Private Hire	5670	Road Wheels

14/05/2013	May	Private Hire	5670	Road Wheels
20/05/2013	May	Hackney Carriage	5670	Road Wheels
21/05/2013	May	Private Hire	5670	Road Wheels
05/06/2013	June	Private Hire	5670	Road Wheels
05/06/2013	June	Private Hire	5670	Road Wheels
19/06/2013	June	Private Hire	5670	Road Wheels
30/07/2013	July	Private Hire	5670	Road Wheels
17/09/2013	September	Private Hire	5670	Road Wheels
26/09/2013	September	Private Hire	5670	Road Wheels
17/10/2013	October	Private Hire	5670	Road Wheels
09/01/2014	January	Private Hire	5670	Road Wheels
05/02/2014	February	Hackney Carriage	5670	Road Wheels
03/04/2013	April	Private Hire	5680	Seat
04/04/2013	April	Hackney Carriage	5680	Seat
08/04/2013	April	Private Hire	5680	Seat
19/04/2013	April	Private Hire	5680	Seat
14/05/2013	May	Private Hire	5680	Seat
21/05/2013	May	Hackney Carriage	5680	Seat
04/06/2013	June	Private Hire	5680	Seat
06/06/2013	June	Private Hire	5680	Seat
08/08/2013	August	Private Hire	5680	Seat
13/08/2013	August	Private Hire	5680	Seat
11/09/2013	September	Private Hire	5680	Seat
16/09/2013	September	Private Hire	5680	Seat
16/09/2013	September	Private Hire	5680	Seat
16/09/2013	September	Private Hire	5680	Seat
16/09/2013	September	Private Hire	5680	Seat
16/09/2013	September	Private Hire	5680	Seat
01/10/2013	October	Private Hire	5680	Seat
05/11/2013	November	Private Hire	5680	Seat
13/11/2013	November	Private Hire	5680	Seat
03/01/2014	January	Private Hire	5680	Seat
15/01/2014	January	Private Hire	5680	Seat
03/02/2014	February	Private Hire	5680	Seat
04/04/2013	April	Hackney Carriage	5690	Body & Structure
05/04/2013	April	Private Hire	5690	Body & Structure

16/04/2013	Private Hire	5690	Body & Structure	1
08/05/2013	Private Hire	5690	Body & Structure	1
16/05/2013	Private Hire	5690	Body & Structure	1
11/06/2013	Private Hire	5690	Body & Structure	1
24/07/2013	Private Hire	5690	Body & Structure	1
05/08/2013	August Hackney Carriage	5690	Body & Structure	1
07/08/2013	Private Hire	5690	Body & Structure	1
08/08/2013	Private Hire	5690	Body & Structure	1
08/08/2013	August Private Hire	5690	Body & Structure	1
15/08/2013	August Private Hire	5690	Body & Structure	1
11/09/2013	September Private Hire	5690	Body & Structure	1
16/09/2013	September Private Hire	5690	Body & Structure	1
17/09/2013	September Private Hire	5690	Body & Structure	1
17/09/2013	September Hackney Carriage	5690	Body & Structure	1
23/09/2013	September Hackney Carriage	5690	Body & Structure	1
25/09/2013	September Private Hire	5690	Body & Structure	1
10/10/2013	October Private Hire	5690	Body & Structure	1
21/10/2013	October Private Hire	5690	Body & Structure	1
23/10/2013	October Private Hire	5690	Body & Structure	1
28/10/2013	October Private Hire	5690	Body & Structure	1
18/11/2013	November Private Hire	5690	Body & Structure	1
19/11/2013	November Hackney Carriage	5690	Body & Structure	1
20/11/2013	November Private Hire	5690	Body & Structure	1
27/11/2013	November Private Hire	5690	Body & Structure	1
04/12/2013	December Private Hire	5690	Body & Structure	1
05/12/2013	December Hackney Carriage	5690	Body & Structure	1
13/12/2013	December Private Hire	5690	Body & Structure	1
16/12/2013	December Hackney Carriage	5690	Body & Structure	1
19/12/2013	December Private Hire	5690	Body & Structure	1
15/01/2014	January Private Hire	5690	Body & Structure	1
22/01/2014	January Hackney Carriage	5690	Body & Structure	1
27/01/2014	January Private Hire	5690	Body & Structure	1
03/02/2014	February Private Hire	5690	Body & Structure	1
02/04/2013	April Hackney Carriage	5730	Fuel & Emissions	1
04/04/2013	April Hackney Carriage	5730	Fuel & Emissions	1
08/04/2013	April Private Hire	5730	Fuel & Emissions	1





19/09/2013	Private Hire	Fuel & Emissions
25/09/2013	Private Hire	Fuel & Emissions
26/09/2013	Private Hire	Fuel & Emissions
02/10/2013	Private Hire	Fuel & Emissions
02/10/2013	Private Hire	Fuel & Emissions
07/10/2013	Private Hire	Fuel & Emissions
10/10/2013	Private Hire	Fuel & Emissions
23/10/2013	Private Hire	Fuel & Emissions
30/10/2013	Private Hire	Fuel & Emissions
31/10/2013	Private Hire	Fuel & Emissions
03/11/2013	November	Fuel & Emissions
06/11/2013	November	Fuel & Emissions
18/11/2013	November	Fuel & Emissions
02/12/2013	December	Fuel & Emissions
13/12/2013	December	Fuel & Emissions
19/12/2013	December	Fuel & Emissions
23/12/2013	December	Fuel & Emissions
03/01/2014	January	Fuel & Emissions
14/01/2014	January	Fuel & Emissions
22/01/2014	January	Fuel & Emissions
29/01/2014	January	Fuel & Emissions
29/01/2014	January	Fuel & Emissions
30/01/2014	January	Fuel & Emissions
11/02/2014	February	Fuel & Emissions
12/02/2014	February	Fuel & Emissions
04/04/2013	April	Fuel & Emissions
08/04/2013	April	Fuel & Emissions
09/04/2013	April	Fuel & Emissions
16/04/2013	April	Fuel & Emissions
01/05/2013	May	Fuel & Emissions
01/05/2013	May	Fuel & Emissions
08/05/2013	May	Fuel & Emissions
16/05/2013	May	Fuel & Emissions
03/06/2013	June	Fuel & Emissions
11/06/2013	June	Fuel & Emissions
18/06/2013	June	Fuel & Emissions

1	Driver's view of road	5750
01/07/2013	Private Hire	5750
01/07/2013	Private Hire	5750
16/07/2013	Private Hire	5750
17/07/2013	Private Hire	5750
23/07/2013	Private Hire	5750
06/08/2013	Hackney Carriage	5750
27/08/2013	Private Hire	5750
30/08/2013	Private Hire	5750
30/08/2013	Private Hire	5750
02/09/2013	Private Hire	5750
10/09/2013	Private Hire	5750
17/09/2013	Private Hire	5750
17/09/2013	Private Hire	5750
18/09/2013	Private Hire	5750
23/09/2013	Private Hire	5750
26/09/2013	Private Hire	5750
30/10/2013	Private Hire	5750
19/12/2013	Private Hire	5750
02/01/2014	Hackney Carriage	5750
06/01/2014	Private Hire	5750
14/01/2014	Private Hire	5750
20/01/2014	Hackney Carriage	5750
20/01/2014	Private Hire	5750
30/01/2014	Private Hire	5750
05/02/2014	Private Hire	5785
08/04/2013	Private Hire	5785
03/06/2013	Hackney Carriage	5785
11/06/2013	Hackney Carriage	5785
12/06/2013	Private Hire	5785
17/06/2013	Private Hire	5785
19/06/2013	Private Hire	5785
29/07/2013	Private Hire	5785
14/08/2013	Hackney Carriage	5785
16/09/2013	Private Hire	5785
08/10/2013	Private Hire	5785
27/11/2013	Private Hire	5785

Registration Plates	
08/01/2014	Private Hire
08/01/2014	Private Hire
08/01/2014	Private Hire
02/04/2013	Hackney Carriage
02/04/2013	Hackney Carriage
08/04/2013	Private Hire
08/04/2013	Private Hire
09/04/2013	Private Hire
11/04/2013	Hackney Carriage
12/04/2013	Private Hire
16/04/2013	Hackney Carriage
16/04/2013	Private Hire
17/04/2013	Private Hire
17/04/2013	Hackney Carriage
19/04/2013	Private Hire
23/04/2013	Private Hire
02/05/2013	Hackney Carriage
07/05/2013	Private Hire
09/05/2013	Private Hire
15/05/2013	Private Hire
21/05/2013	Hackney Carriage
16/07/2013	Private Hire
30/07/2013	July
02/09/2013	September
16/09/2013	September
16/09/2013	September
19/09/2013	September
14/10/2013	October
30/10/2013	October
04/11/2013	November
20/11/2013	November
21/11/2013	November
04/12/2013	December
09/12/2013	December
16/12/2013	December
17/12/2013	December

02/01/2014	January	Hackney Carriage	5800	
03/01/2014	January	Private Hire	5800	HC/PH related items
27/01/2014	January	Private Hire	5800	HC/PH related items
29/01/2014	January	Private Hire	5800	HC/PH related items
30/01/2014	January	Private Hire	5800	HC/PH related items
12/02/2014	February	Private Hire	5800	HC/PH related items
12/02/2014	February	Private Hire	5800	HC/PH related items
22/01/2014	January	Private Hire	5800	HC/PH related items

Description of failure	Data	Total
<b>Body &amp; Structure</b>	Count of Fail Count of P.Hire/Hackney C	35 35
<b>Brakes</b>	Count of Fail Count of P.Hire/Hackney C	177 177
<b>Driver's view of road</b>	Count of Fail Count of P.Hire/Hackney C	36 36
<b>Fuel &amp; Emissions</b>	Count of Fail Count of P.Hire/Hackney C	100 100
<b>HC/PH related items</b>	Count of Fail Count of P.Hire/Hackney C	41 100
<b>Lighting &amp; Signalling</b>	Count of Fail Count of P.Hire/Hackney C	214 214
<b>Registration Plates</b>	Count of Fail Count of P.Hire/Hackney C	14 14
<b>Road Wheels</b>	Count of Fail Count of P.Hire/Hackney C	12 12
<b>Seat</b>	Count of Fail Count of P.Hire/Hackney C	22 22
<b>Steering</b>	Count of Fail Count of P.Hire/Hackney C	87 87
<b>Suspension</b>	Count of Fail Count of P.Hire/Hackney C	184 184
<b>Tyres</b>	Count of Fail Count of P.Hire/Hackney C	92 92
<b>(blank)</b>	Count of Fail Count of P.Hire/Hackney C	1 1

% Fails April to October 2013

	%Fails		%Fails
	PH & HC		HC
<b>Body &amp; Structure</b>	<b>3</b>		<b>3.2</b>
<b>Brakes</b>	<b>18.7</b>		<b>18.4</b>
<b>Drivers view of road</b>	<b>3.8</b>		<b>3.2</b>
<b>Fuel &amp; Emissions</b>	<b>11.4</b>		<b>13.6</b>
<b>HC/PH related items</b>	<b>3.5</b>		<b>4.8</b>
<b>Lighting &amp; Signalling</b>	<b>19.6</b>		<b>16</b>
<b>Registration Plates</b>	<b>1.3</b>		<b>2.4</b>
<b>Road Wheels</b>	<b>1.5</b>		<b>0.8</b>
<b>Seat</b>	<b>2.3</b>		<b>1.6</b>
<b>Steering</b>	<b>9.2</b>		<b>11.2</b>
<b>Suspension</b>	<b>17.4</b>		<b>19.2</b>
<b>Tyres</b>	<b>7.3</b>		<b>5.6</b>

Count of Fail	Description of failure	P.Hire/Hackney C	Total
<b>Body &amp; Structure</b>	Hackney Carriage	8	6.4
<b>Brakes</b>	Hackney Carriage	26	20.8
<b>Driver's view of road</b>	Hackney Carriage	7	5.6
<b>Fuel &amp; Emmissions</b>	Hackney Carriage	19	15.2
<b>HC/PH related items</b>	Hackney Carriage	8	6.4
<b>Lighting &amp; Signalling</b>	Hackney Carriage	28	22.4
<b>Registration Plates</b>	Hackney Carriage	3	2.4
<b>Road Wheels</b>	Hackney Carriage	1	0.8
<b>Seat</b>	Hackney Carriage	2	1.6
<b>Steering</b>	Hackney Carriage	19	15.2
<b>Suspension</b>	Hackney Carriage	34	27.2
<b>Tyres</b>	Hackney Carriage	14	11.2
		169	

Count of Fail	Description of failure	P.Hire/Hackney C	Total
<b>Body &amp; Structure</b>	Private Hire	25	4.0
<b>Brakes</b>	Private Hire	146	23.6
<b>Driver's view of road</b>	Private Hire	27	4.4
<b>Fuel &amp; Emmissions</b>	Private Hire	76	12.3
<b>HC/PH related items</b>	Private Hire	28	4.5
<b>Lighting &amp; Signalling</b>	Private Hire	174	28.2
<b>Registration Plates</b>	Private Hire	11	1.8
<b>Road Wheels</b>	Private Hire	11	1.8
<b>Seat</b>	Private Hire	19	3.1
<b>Steering</b>	Private Hire	65	10.5
<b>Suspension</b>	Private Hire	143	23.1
<b>Tyres</b>	Private Hire	76	12.3
		801	

**N.B. Vehicles may have failed on more than one component per test.**

Sheet7

Description of failure	Data	Total
Body & Structure	Count of Fail Count of P.Hire/Hackney C	22 22
Brakes	Count of Fail Count of P.Hire/Hackney C	139 139
Driver's view of road	Count of Fail Count of P.Hire/Hackney C	28 28
Fuel & Emissions	Count of Fail Count of P.Hire/Hackney C	85 85
HC/PH related items	Count of Fail Count of P.Hire/Hackney C	26 26
Lighting & Signalling	Count of Fail Count of P.Hire/Hackney C	146 146
Registration Plates	Count of Fail Count of P.Hire/Hackney C	10 10
Road Wheels	Count of Fail Count of P.Hire/Hackney C	11 11
Seat	Count of Fail Count of P.Hire/Hackney C	17 17
Steering	Count of Fail Count of P.Hire/Hackney C	68 68
Suspension	Count of Fail Count of P.Hire/Hackney C	129 129
Tyres	Count of Fail Count of P.Hire/Hackney C	62 62
Data		
Body & Structure	Count of P.Hire/Hackney C	22
Brakes	Count of Fail	139
Driver's view of road	Count of Fail	28
Fuel & Emissions	Count of P.Hire/Hackney C	85
	Count of P.Hire/Hackney C	85

**Sheet7**

<b>HC/PH related Items</b>	
Count of Fail	26
Count of P.Hire/Hackney C	26
Count of Fail	146
Count of P.Hire/Hackney C	146
Count of Fail	10
Count of P.Hire/Hackney C	10
Count of Fail	11
Count of P.Hire/Hackney C	11
Count of Fail	17
Count of P.Hire/Hackney C	17
Count of Fail	68
Count of P.Hire/Hackney C	68
Count of Fail	129
Count of P.Hire/Hackney C	129
Count of Fail	62
Count of P.Hire/Hackney C	62
<b>Lighting &amp; Signalling</b>	
<b>Registration Plates</b>	
<b>Road Wheels</b>	
<b>Seat</b>	
<b>Steering</b>	
<b>Suspension</b>	
<b>Tyres</b>	



## Ward , William

---

**From:** lee walton <leewalton2010@hotmail.co.uk>  
**Sent:** 27 May 2014 14:40  
**To:** Petty , Caroline  
**Cc:** Frow , Simon; Liddall , Kate; David Wilson  
**Subject:** letter of objection

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon

Please accept this as my letter of objection to the fee increase in which BMBC wish to impose on the taxi trade.

Since the new fee structure was proposed in the chronicle several of the independents that I represent in the TLG meetings have been beating a path to my door, the majority of the independents are happy with the price reduction in the operator licence fee but are questioning why for several years now they have had to pay £320.00 for a years licence and now BMBC are wanting to implement a one year licence for £63.00 and a five year licence £127.00.

They are also happy with Vehicle licence fee which will be changing to one of payment regardless of age of the vehicle from what it is now, this is also a reduction in the current fee for vehicles over five years old but also a small increase for newer vehicles for which the trade are happy with.

But unfortunately after trying no end to explain how BMBC are calculating the Drivers licence fee, the independents are struggling work out why the badge has increased in price by 67.1% from £82.00 to £137.00. The general consensus towards this increase is they would rather stick with a one year badge at a cost of £82.00 and not bother with the three year badge at £221.00. They feel that there is nothing to be gained financially for the trade by this implementation of the three year badge.

The independents object to the fees being set by BMBC on the grounds that some are over priced and that the financial working are not clear on the costing on how they have achieved an 67.1% increase.





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3 Biddick Hall Cottages, Lambton Park, Chester-le-Street DH3 4PH  
Tel: 0191 2449638 / 0191 3857313  
Fax: 0191 2475855

Mrs Caroline Petty  
Group Leader Pollution & Licensing  
Culture, Regulation & Housing  
Barnsley Metropolitan Borough Council  
PO Box 602  
Barnsley  
S70 9FB

Our Ref: DBW / BPHA-BHCA-ATA-BLT  
Your Ref:  
Date: 30 May 2014  
Please ask for: David Wilson

**By First Class post and email to:**  
**CarolinePetty@barnsley.gov.uk**

Dear Mrs Petty,

**Proposed changes to fees for driver, vehicle and operator licences  
Local Government (Miscellaneous Provisions) Act 1976  
Objection to vehicle and operator licence fees proposed under section 70  
Submission in relation to the driver licence fees under section 53 fees**

I am instructed by Barnsley Private Hire Association (BPHA), Barnsley Hackney Carriage Association (BHCA), Alliance Trade Association (ATA) and Blueline Taxis (Barnsley) Ltd (BLT) to object to the vehicle and operator licence fees proposed under section 70 and to make a submission in relation to driver licensing fees under section 53 of the said Act.

At the outset, my clients would like to record their regret that officers did not see fit to disclose to them any of the documents prepared and used to calculate the proposed fees, before proceeding to advertise those fees, because if it had done so, my clients would have hoped that the points raised herein (and possibly others) would have been addressed by officers, which might well have negated the need for my clients to make this objection / submission.

That having been said, my clients and I are obliged to you, Mr Frow and Mrs Liddall for providing the relevant documents, provided pursuant to my request under the Freedom of Information Act 2000 (FOI), sufficiently promptly, so that we had an opportunity to consider them, before making this objection / submission.

For the avoidance of future doubt or confusion, I confirm that the documents provided in response to my aforementioned request were:

- Proposed Driver Licence Fees (MS Word)
- Proposed Fee Summary (MS Word)

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- Proposed Operator Licence Fees (MS Word)
- Proposed Vehicle Licence Fee inc. External MOT's (MS Word)
- Proposed Vehicle Licence Fees inc. Additional Enforcement Activity (MS Word)
- Proposed Vehicle Licence Fees Summary (MS Word)
- Taxi Licence Budget 14-15 (Consultation) (MS Excel)
- Taxi Licensing Fees – Approved Briefing Note (PDF)
- Working Time Analysis Report 2011-2012 (MS Excel)

It appears from the various fee proposals that the baseline fees, which are based on the Working Time Analysis Report 2011-2012 and the Taxi Licensing Budget 14-15 (Consultation) with annual driver licence fee of £137; annual vehicle licence fees of £73; and operator licence fee of £63, have not been adjusted to reflect:

- the efficiency improvements that have been made (or are shortly to be made) as part of the review of the service; and / or
- the changes that have been made to other parts of the Council that are charged as CSC (Central Services Charges?), presuming that austerity and the need to make savings have applied to those services as much or more than they have to Regulatory Services, particularly taxi licensing.

The Taxi Licensing Budget 14-15 (Consultation) includes a 'comment' explaining how the 'Salary Related Expenditure (Incl NI & Super)' has been calculated / apportioned for the different officer grades and applied to each type of licence – driver, vehicle and operator. However, the apportionment noted is different to that specified in respect of each type of licence in the Working Time Analysis Report 2011-2012.

To take the specified percentages for the 3 Technical Clerks (Grade 3) as an example, the 'comment' in the Taxi Licensing Budget 14-15 (Consultation) states that 18% of each of the three officers' salary related expenditure has been included in the calculation of the proposed fees for each of the three types of licence, whereas the Working Time Analysis Report 2011-2012 would seem to show that the percentages were and, in view of greater efficiencies in the service, ought to be no more than:

- Driver Licensing – 16.33% ( $25\% + 7\% + 17\% = 49 / 3 = 16.33\%$ )
- Vehicle Licensing – 12.33% ( $12\% + 11\% = 14\% = 37 / 3 = 12.33\%$ )
- Operator Licensing – 0.67% ( $1\% + 0\% + 1\% = 2 / 3 = 0.67\%$ )

The calculated fee for vehicle licensing in the Taxi Licensing Budget 14-15 (Consultation) wrongly includes:

- £1,000 in relation to the annual cost of the DVLA Check Service, which relates to drivers and ought to be included in the calculation of driver licence fees (adding about £3 to each driver licence fee, because the driver licence fee will have to include the annual costs for three years and not just the year of renewal / grant; and
- £6,720 in relation to a recharge for Transport Inspectors, which appears to be a double charge as those costs are also included in the additional enforcement costs detailed in the Proposed Vehicle Licence Fees inc. Additional Enforcement Activity.

On the assumption that the 'Miscellaneous – Materials' charge in relation to Vehicle Licensing relates to the cost of vehicle licence plates, it is accepted that the charge has been correctly recorded at £3,770 as an average based on the last three years, as indicated by the 'comment', but this figure has not been adjusted to reflect that in the future only one plate will be issued to each vehicle annually, whereas in the past vehicles over 5 years of age would have had three plates issued annually.

It is respectfully submitted that the Council must know the cost of individual plates and should, therefore, be able to simply include in the fee calculation that cost as a cost per vehicle licence.

Whilst there is undoubtedly a cost in relation to recording the results of MOT tests, administering vehicle licence suspensions and the like, as detailed in the Proposed Vehicle Licence Fee inc. External MOT's document, there must be an element of double charging officer time, because the Working Time Analysis Report 2011-2012 must have included time recorded for 'actions' similar to those detailed in the Proposed Vehicle Licence Fee inc. External MOT's document.

At the TLG (Trade Liaison Group) meeting on 16 April 2014, officers advised that they were still developing the reporting procedures between the independent MOT test stations and themselves and the associated procedures, so they could not advise when the ability to use external MOT testing stations would become available. In the circumstances, it is surprising to now have a copy of the Taxi Licensing Fees – Approved Briefing Note document, signed the very same day (16 April 2014) by Councillor Roy Miller, which seems to indicate that procedure has not only been devised, but that it has also been possible to establish which grade of officer will take which action and how long it will take them.

The aforementioned document has clearly been prepared with the benefit of the Proposed Vehicle Licence Fee inc. External MOT's document, which seems to set out in detail the processes to be followed, which grade of officer will be responsible for each 'action' and an estimate of how long each such action will take. Not only does this document also include charges for actions similar to those that must have been included in the Working Time Analysis Report 2011-2012, but the times for all of the actions seems excessive.

For example, when a vehicle fails an interim test necessitating the issue of a suspension notice, it is claimed that officers will be engaged for a total of almost 3 hours in receiving the MOT test results; inputting data and scanning documents; and issuing and lifting the suspension notice once a re-test has been passed, as follows:

- |                                     |                    |
|-------------------------------------|--------------------|
| • Technical Clerk                   | 1 hour             |
| • Regulatory Services Field Officer | 1 hour 50 minutes. |

Whilst it is accepted that it is most likely that officers have erred on the side of caution with their time estimates, these being untried processes, I must personally state from experience as a former local authority licensing manager, who operated a similar regime to that to which the Council is moving, the total time that my officers were engaged (admittedly using a different licensing package) was about 30 minutes in total, namely:

- 20 minutes to receive notification of the test failure; scan and input data onto the licensing package, which generated the suspension notice; and to emailing or posting that notice to the vehicle proprietor; and
- 10 minutes to receive notification of the re-test pass; scan and input data onto the licensing package, generating notice of the lifting of the suspension; and to emailing or posting notice of lifting of the suspension to the vehicle proprietor.

The difference in time between the two processes being accounted for by the fact that there is less information and fewer documents to scan when lifting a suspension than there is when preparing, issuing and serving a suspension.

In connection with driver licensing, if one were to accept that the Working Time Analysis Report 2011-2012 correctly detailed the cost of a one year driver licence in the sum of £137, the only additional charges of those detailed in the Proposed Driver Licence Fee document for years 2 and 3 would be:

- £3 (3 x £1) in respect of the annual cost of the DVLA Check Service
- £2 (2 x £1) in respect of the DVLA checks made at the end of years 1 and 2
- £8.60 in relation to the total time of 30 minutes spent by Technical Clerks undertaking the online DVLA check; updating the licensing system; and, if necessary, referring a driver with penalty points that contravened the Council's policy to a regulatory services Field Officer (RSFO).

On the basis that efficiency savings, such as receiving renewal applications electronically, ought to have reduced the base costs to less than the stated £137, the total costs for a 3-year driver licence ought also to be no more than £150.60 and, one would hope, significantly less.

Regrettably, the time since receiving the documents in response to the FOI request and the closing date for making objections / representations has not allowed for a more detailed assessment of the core data contained within the Working Time Analysis Report 2011-2012 or to raise enquiries of, or to discuss matters with officers. In the circumstances, despite the appearance that may be created by this five-page letter, I must state that the above are only examples of issues my clients have with the fee calculations and are not (and should not be regarded as being) an exhaustive list.

If time permitted for these matters to be discussed constructively by officers with me and my clients, I can assure the Council that opportunity would be wholeheartedly embraced by my clients in the hope that agreement can be reached, which would avoid the need for them to make a renewed objection / representation, if the Council accepts that its current fee setting process is legally flawed. Indeed, an agreement on fees would also avoid the possibility of my clients making further objections to the District Auditor next year in respect of charges that will then have been made in the current year (2014-2015).

If such discussions are possible, I look forward to hearing from you with regards to a suggested date and time for a meeting. Alternatively, if the setting of fees is to proceed for determination by Cabinet, the General Licensing Regulatory Board or Council (the decision-making body), despite my letter of even date detailing why the current fee setting process is unlawful, please note that I would wish to request an opportunity to address the decision-making body when it considers this matter.

Yours sincerely,



**David B Wilson**  
Licensing Consultant, Mediator and Trainer

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Mrs Caroline Petty  
Group Leader Pollution & Licensing  
Culture, Regulation & Housing  
Barnsley Metropolitan Borough Council  
PO Box 602  
Barnsley  
S70 9FB

Our Ref: DBW / BPHA-BHCA-ATA-BLT  
Your Ref:  
Date: 30 May 2014  
Please ask for: David Wilson

**By First Class post and email to:**  
**CarolinePetty@barnsley.gov.uk**

Dear Mrs Petty,

**Proposed changes to fees for driver, vehicle and operator licences**

**Local Government (Miscellaneous Provisions) Act 1976**

**Challenge to the lawfulness of the Council's fee setting procedure**

I am instructed by Barnsley Private Hire Association (BPHA), Barnsley Hackney Carriage Association (BHCA), Alliance Trade Association (ATA) and Blueline Taxis (Barnsley) Ltd (BLT) to challenge the lawfulness of the Council's fee setting process.

At the Trade Liaison Group (TLG) meeting on 16 April 2014, officers advised that following that meeting they were attending a meeting with Councillor Roy Miller, Cabinet Member for Development, Environment & Culture, to seek his approval for consultation the proposed fees for driver, vehicle and operator licences.

Upon my suggesting the proposed process was unlawful, because a single councillor, even if a Cabinet Member, could not set the fees, officers stated that Councillor Roy Miller would not be setting the fees, but authorising a consultation process and that, even if no objection was received, the fees would be considered and set by Cabinet.

When I pointed out that section 70(4) of the Local Government (Miscellaneous Provisions) Act 1976 provided for the fees to come into force, if no objection was made in response to the publication of a statutory notice, officers advised that, whether there was an objection or not, the proposals would be determined by Cabinet at a future meeting.

When I suggested that the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) might prohibit the setting of fees by Cabinet, but acknowledged that I was unsure whether that was the position and would have to look it up, officers reassured all present at the TLG meeting that the fees and the processes had been considered by finance, audit and legal and everything was entirely in order and legal.

Regrettably, despite the assertions and reassurances given by officers that everything was entirely in order and legal, I must advise that my suspicions that fees could not be determined by Cabinet has turned out to be the case.

In this regard, I respectfully refer you to regulation 2(6)(d) and (e) and Schedule 1, items B3, 4 and 5 of the aforementioned Local Authorities (Functions and Responsibilities) (England) Regulations 2000, which expressly prohibits an authority's executive from determining whether to charge for a licence and, if a charge is to be made, the amount of any such charge.

In the circumstances, the power to set fees under section 70 of the 1976 Act is vested in the Council and may, by virtue of section 101 of the Local Government Act 1972, be delegated to a committee, sub-committee or officer.

Having reviewed the Scheme of Delegation contained within the Council's Constitution (version 10 of April 2014), it appears the Council delegated the power to set hackney carriage and private hire licensing fees to the General Licensing Regulatory Board, subject to it taking into account policy considerations of Cabinet and / or Council.

If the Council were to proceed to have fees set by Cabinet it would expose itself to a significant risk of the process and resultant fees being challenged by judicial review.

As recently as 30 April 2014, in R (on the application of Bridgerow Ltd) v Cheshire West and Chester Borough Council, the High Court held that a decision made by a committee and not a panel (a sub-committee) of that committee was unlawful and had to be set aside, because the decision was "taken by a group of people who had no power to take it."

For ease of reference, I enclose copies of:

- the Local Authorities (Functions and Responsibilities) (England) Regulations 2000;
- the judgment in R (on the application of Bridgerow Ltd) v Cheshire West and Chester Borough Council [2014] EWHC 1187 (Admin); and
- an extract of the Scheme of Delegation contained in the Council's Constitution (version 10 of April 2014).

In all the circumstances, I should be obliged if the Council would kindly confirm that it will abort its current unlawful fee setting process and take steps to comply with the law and the requirements of its own constitution and scheme of delegation.

As this procedural error has caused further unnecessary delay to achieving one of the District Auditor's objectives, my clients would like to request and urge officers to meet with me and them, before presenting a report to the General Licensing Regulatory Board, in the hope that the matters that would otherwise be raised as objections might be considered by officers, who might hopefully accept there has been some unintentional double-charging or charging for processes that are not undertaken annually.

My clients would hope that, by engaging in dialogue with officers at this stage, they would not in due course find it necessary to object to the revised proposed fees, which might also avoid the need for the General Licensing Regulatory Board to consider objections, which is bound to further delay the implementation of new fees.

Despite all that has been said about the unlawfulness of the fee setting process the Council is currently pursuing, my clients shall still make an objection to the fees proposed by that process, but that should not be misinterpreted as any kind of acceptance that the current fee setting process is anything other than unlawful.

I look forward to hearing from you in relation to these matters by no later than the close of business on Friday, 13 June 2014.

Yours sincerely,



**David B Wilson**  
Licensing Consultant, Mediator and Trainer

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