

Appendix 3: Taxi Licensing Fees 2020 – List of objections received by 3 February 2020

No.	Date received	Details of the objection (cut and paste content of email/type in content of letter)	Response
1	9/1/2020	<p>Councillors complain that they tried to get a taxi over Christmas/New Year but couldn't. It's once a year, which is probably the only time they use us. If they were to come out on a Friday or Saturday night during January/February they'd see cabs a plenty parked up. It's why they call it Kipper season.</p> <p>The problem with Plymouth train station is down to the franchise to operate the rank increasing 2.5% every year. As an ex Finance Director of PTL I can't tell you how much it was, but it was considerable sum. That's down to FGW, it's their land and they can charge what they like. Need a Cab who now operate the rank charge rent to drivers to work it. Not sure how much but again, in 2017 it was either £5200 or £7200 a year that each driver paid. Not sure what it is now. It could be more or could be less.</p> <p>Regarding license fees £500 this year from 1 April for a 3 year badge. The percentage rate its increasing every year means that in a few years time we could be looking at £700.</p> <p>Then councillors will wonder where all the cabs have gone. As drivers reach a certain age they'll be contemplating whether it's really worth it anymore and giving up.</p>	<p>Thank you for your email. During the Committee, there was a discussion with Members that there are times such as Christmas when it is peak demand and there will always be certain times when it is harder to get a taxi. There have also been a number of examples throughout the year where there have been lack of taxis available at the Barbican and Raleigh Street Ranks and this is generally at peak times such as payday weekends and bank holidays.</p> <p>The Council is aware of the station charges and that the provider has now changed. Late trains can also mean that two trains arrive at the same time which leads to long queues at the taxi rank.</p> <p>The fees are reviewed annually and are increased as required based on the actual costs incurred.</p>
2	13/1/2020	<p>This email is a objection to the letter I received today about taxi fees going up it went up 98% last year it's ok for you get a pay</p>	<p>Thank you for your email.</p>

		<p>rise every year iv been taxing 20 year's only had one joke Plymouth city council just a rip off .</p>	<p>None of the fees were increased by 98% last year. Full details can be found in the Taxi Committee Report on 21 March 2019 which is on our website at http://web.plymouth.gov.uk/modgov?modgovlink=http%3A%2F%2Fdemocracy.plymouth.gov.uk%2FieListDocuments.aspx%3FCId%3D566%26amp%3BMid%3D8041%26amp%3BVer%3D4</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire Accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p>
3	13/1/2020	<p>I am writing to make an open government request for all the information to which I am entitled under the Freedom of Information Act 2000.</p> <p>Please send me:</p> <p><i>A full breakdown of all taxi licensing fees expenditure.</i></p> <p><i>From April 2018 to Date.</i></p> <p>I would like the above information to be provided to me as <i>paper or electronic copies or an opportunity to view.</i></p> <p>If this request is too wide or unclear, I would be grateful if you could contact me as I understand that under the Act, you are required to advise and assist requesters. If any of this</p>	<p>Your FOI request has been logged and this will be dealt with separately.</p>

		<p>information is already in the public domain, please can you direct me to it, with page references and URLs if necessary.</p> <p>If the release of any of this information is prohibited on the grounds of breach of confidence, I ask that you supply me with copies of the confidentiality agreement and remind you that information should not be treated as confidential if such an agreement has not been signed.</p> <p>I understand that you are required to respond to my request within the 20 working days after you receive this letter. I would be grateful if you could confirm in writing that you have received this request.</p> <p>I look forward to hearing from you.</p>	
4	13/1/2020	<p>I am objecting to the proposed increase in taxi fees it was only eight months since you increased fees by 95% and now you want an 8% increase what happened to prices rising by the rate of inflation. It cannot be because of a deficit in the taxi account you've been using that one for years, it's not a bottomless pit working in this trade keep chipping away at it and more people will just walk away.</p>	<p>Thank you for your email.</p> <p>None of the fees were increased by 95% last year. Full details can be found in the Taxi Committee Report on 21 March 2019 which is on our website at http://web.plymouth.gov.uk/modgov?modgovlink=http%3A%2F%2Fdemocrac.y.plymouth.gov.uk%2FieListDocuments.aspx%3FCId%3D566%26amp%3BMId%3D8041%26amp%3BVer%3D4</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire</p>

			accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.
5	16/1/2020	<p>I am writing to object against the proposed Hackney Carriage fees increases. I feel they are extortionate and unnecessary and are driving people out of the trade.</p> <p>I have been a Taxi Driver for 30 years, the trade is nowhere near vibrant and lucrative of past years. It is hard to make ends meet now, without fee increases, which will no doubt be passed onto the customer via fare increases, which we don't want to happen, we need to encourage them to take a taxi not frighten them away.</p> <p>Only the other day Cllr Pengelly stated "where are all the taxis" she couldn't get one. Well let me tell her and others "put the fee's up and there be lot less to call on"</p> <p>I would advise these Councillors who shout the loudest, to come and be taxi marshal on a Saturday night, see for themselves the abuse, they along with ourselves as drivers have to put up with taking drunks and abusive customers home, eating McDonalds, kebabs and pizza's etc, having to clean the back of our vehicles up, with it wasted everywhere.</p> <p>Then they might realise and understand why there's a lack of taxis on a Saturday evening.</p> <p>And now the council wish to charge taxis driver's more than ever for the privilege of doing so.</p>	<p>Thank you for your letter. Taxi Licensing Committee Members often go out with enforcement officers and the police and witness first-hand the abuse that drivers encounter. The Barbican and Raleigh Street Taxi Marshals were introduced to assist drivers when dealing with customers in the Evening and Night Time Economy areas. We encourage all drivers to report any incidents of abuse to the Police so this is logged and the statistics can be used to target operations.</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire Accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p>

		Thank you Plymouth City Council	
6	20/1/2020	<p>I am writing in response to the latest consultation regarding taxi fees, which you are proposing to increase them by 12% when you put badge and plate together.</p> <p>I strongly object to this increase as the fees which went up last years has already put a strain on the trade. Taxi drivers are earning far below the national living wage as it is, with too many drivers are having to work longer hours as it is, who are deprived from seeing their families. This in my mind goes against the council's policy to limit child poverty. Children need to be spending more time with both parents.</p> <p>It is council policy to see that people are paid a living wage, yet no school transport trip pays the drivers the living wage, when taking in account the cost to be a driver in the first place.</p> <p>The city council night-time economy is failing to attract visitors over the age of 35, as traders only seem interested in the student population. With no airport and very few visitors to the city has affected the taxi trade. Making life harder for many drivers.</p> <p>Secondly by raising the fees you are pricing out new blood from coming into the trade, it would cost a new driver over £1000 in fees before even getting a cab to start up as a driver, every private hire office is looking for drivers, this goes against council policy to encourage more jobs.</p> <p>I gather that a number of plates have been handed back to the council from drivers who have left the trade, which are not being reissued. While accepting we may have a deficit in the taxi trade but maybe by issuing these plates to drivers who hold</p>	Thank you for your email.

badges would help reduce the deficit, not by letting none drivers who just want to rent out the cab and plate making life harder for the drivers.

There are already non licenced taxis going around the city at night picking up the public known as cowboy drivers, I fear by raising the fees will encourage more of this, putting many young females in danger. Which could also breach the councils safeguarding policy.

Lastly as you the council are the guardians of the taxi accounts, I would suggest you review your situation, are you really giving us best value for our money? When taxi ranks disappear for developments do you not ask for a section 106 money to compensate the trade for the loss of the ranks? Do night clubs not have a responsibility in seeing their customers are getting home in a safe manner which a night-time levy could be imposed.

When consulting on new ranks etc why do this not come from the transport budget which is aimed at encouraging people to use public transport, to reduce congestion. In the council transport plan, it states that “taxi and private hire vehicles continue to remain and important part of the transport network”. I see lack of evidence of this policy, we still don’t have a rank to serve Home Park and the Life Centre, very often I get asked by customers coming via to station where there have to wait for a taxi in order to get back to the station, furthermore we still don’t have a rank for the Pavilions. Most city centres have signage around the city centre highlighting where the nearest ranks are, not in Plymouth!

The Licensing Department do not believe there are any non-licensed taxi drivers operating in Plymouth. We investigated a report in January 2019 regarding a Private Hire Vehicle with an Oxford plate, however there is no evidence to suggest that they had been operating as a taxi driver. We take allegations of rogue taxi drivers very seriously and will investigate any reports. If you have any information, please report this at www.plymouth.gov.uk/licensingandpermits/taxilicensing/taxicomplaints or email taxi.licensing@plymouth.gov.uk.

The businesses within a Business Improvement District (BID) area pay a levy and this levy is used to fund the Barbican Taxi Rank Marshals which assists customers to be taken home safely at night.

The Taxi Licensing Team work closely with the Planning Department to ensure taxi ranks and Private Hire drop off bays are considered for all new and future developments for example the bus station, Bar Code, Premier Inn at Derry’s cross and the plans for Old Town Street changes.

We also witnessed new road layouts where taxis are excluded from using bus lanes known as bus gates, surely its fair to allow taxis the same access as buses.

In a recent article published in the Herald it ask where have all the taxis gone, and councillors stating they could not get a taxi over the busy festive season particularly on a Friday and Saturday night, maybe this question should be raised with the police, as most drivers seem to be on their own when dealing with the awkward customers, when we have seen drivers racially attacked and assaulted. When customers foul the cab the police fail to support us from getting the council levy charge of £50. With all of these issues it puts a lot of drivers off from working the town on Friday and Saturday nights, even a council taxi officer has said to me once that he could not do our job! I gather when the city council loses a planning applications the cost comes from the legal services budget, not the planning budget, so why charge the taxi trade for the Council's failure to win the cases against taxi drivers, it is not the individual drivers fault if you fail to win court cases, maybe you should review this, ask yourselves why you're losing them, are the legal services giving the right legal advice at committee like they do with planning applications? Especially when councillors go against the officer's advice.

When we get drivers illegally parking on taxi ranks, we get no support from the parking officers, still today we get people parking on Cornwall Street Rank, which I have raised many times, even the parking officers fail to give out a ticket, and quoted to me that they are doing nothing wrong, when in fact it's a 24 hour rank. A share of the parking fines for people

The costs incurred with dealing with court cases are for either prosecutions or for appeals against Committee decisions, where a driver's licence has been revoked or suspended. The cost of the service needs to be met and must therefore be allocated to the two trades.

All drivers can appeal to the Magistrate's Court against a committee decision to suspend or revoke their licence. If a driver appeals then the Council must defend its case. The council have been found by the Magistrates Court on all our cases to have made the correct decision and if any costs are granted by the Court, they are returned to the trade account.

The Court must follow their guidelines on awarding costs. As these appeals are more civil in nature than criminal, the Court looks at the reasonableness of the action taken by the losing party. It also has to take account of someone's ability to pay. In prosecutions, it is different as the defendants have not had to pay any court fees and there is an element of punishment that comes into the penalties imposed which can include costs.

		<p>parking on the ranks could go towards the taxi account to help improve the taxi facilities like raising kerbs for wheelchair users.</p> <p>As stated earlier I fail to see how the taxi trade is part of the city council's network, you fail to make ways to improve the ranks, you're constantly putting in unnecessary barriers in the way of the trade making life harder for the drivers who are just trying to earn money to feed a family. Its okay for the civil servants who make the decisions and write the reports they get pensions, holiday pay, sick pay paid above the minimum wage which no driver gets.</p> <p>Raising the fees will lead to less taxis not more, by taxing taxi drivers off the road you are not only hurting the driver and his or her family but you also hurting the disabled and elderly along with families in poverty who can't afford a car.</p> <p>I would recommend you take this proposal off the shelve, please reject the increase, bring the fees down to attract new blood into the trade and stop using the taxi trade as a cash cow. And review the taxi accounts and look at other ways to resolve the deficit with better management with sensible action.</p> <p>PS under data protection I do not wish to have my name and address published on any council document, in private or public.</p>	<p>The Taxi Licensing Department have been reviewing the issues at the Cornwall Street Rank and this should be finalised shortly.</p>
7	20/1/2020	<p>Please find attached my objection to the fee increase and the improvements that could work in improving the large PHV account deficit.</p>	<p>Thank you for your email and letter.</p> <p>The Private Hire Account does not have a deficit. There is a reserve account for the Private Hire account so whilst the summary shown in Appendix 2 for 2019/20 forecasts a deficit of £31,401, the overall accounts</p>

It is a few pages to read but big changes need to be made in the licensing sector in order to remain afloat and debt free as well as updating the outlook in this sector of work.

This is a detailed description of what needs to be done and the work that needs to be set out in order to improve this failing system - the deficit will only increase the way the licensing department is being ran currently.

All the best,

**OPPOSITION TO THE TAXI AND LICENSING FEE
INCREASE AND POSSIBLE IMPROVEMENTS**

To whom this may concern,

I am writing on behalf of the recent decision to increase taxi fees, more specifically Hackney Carriage fees of which are already incredibly high. I am also very concerned as to the gap between the fees of Hackney Carriage drivers and PHV drivers.

My argument is that with these subtle increases, the Hackney carriage trade falls into further uncertainty. The previous increase caused has already creates quite a stir amongst the Hackney community but for a further increase to now be on the cards, it will only alienate the separate the two kinds of drivers and alienate the Hackney Carriages from the authorities with losses in drivers in favour of private hire being a possibility.

I find our fees shockingly high and the fee system to be completely weighted towards private hire drivers. I am glad to see an introduction of further operator fees but the problem still lies in

remain in balance as this is offset from monies held within the reserve. As the 2019/20 forecast shows a reduction in the reserve (costs more than the income), in order to balance the accounts going forward, fees must be reviewed and increased over the 5 year period to 2023/24.

how much cheaper the start up and running cost for private hire drivers is when put next to Hackney Carriage which are now becoming even more expensive and off putting. These prices are already hard to meet as drivers are forced to balance other expenses such as cab rent (of which some pay additional rate to access the station for work), insurance, fuel, repairs, dockyard pass renewal, various tests and expenses – this is before profit. Although private hire experience most of the same scrupulous testing and overheads, the price scaling makes it much more manageable to be a PHV driver and even after the new increase in April, the costs compared are still hundreds less when all overheads are added up. Private hire continues to still be much cheaper where in reality, on the most part, the approach of private hire vehicles being much cheaper compared to Hackney Carriages is an alien concept in most other cities of which charge one fixed price for both types of taxis.

The latter approach is completely fair and makes it just as accessible for both types of driver. Plymouth's system only makes struggling hackney carriage drivers work harder with little benefit as supposed benefits such as being able to pick up anywhere is becoming more and more obsolete due to the trend-setting utilization of taxi booking apps that have created a grand impression on customers due to convenience and wide spread use of smartphones and so the taxi industry has suffered a considerable change in the way taxi booking is accessed and the market has seen a great share of Hackney 'flagging' be lost in favour of pre-booked taxis.

It means most Hackney Carriages become glorified private hire vehicles as the bulk of their work is pre-booked operator-based

The fees have been reviewed for this year and the Hackney Carriage fees need to be increased by 8% for vehicles and 15% for drivers to cover the costs incurred.

When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.

fares. This was most evident when the last firm of Hackney only work went under last year, the firm being Plymouth Taxis, sold its assets and drivers onto Need-a-Cab to which beforehand was holistically a private hire firm. It is with this I am appalled when I see further increases to their sky-high expenses as they now do a great deal of PHV work at a PHV fare rate of which has also caused a blow to their income.

In targeting this issue, the deficit of the licensing authority mentioned in the 8th of January 'fee increase' committee meeting could look at how much the taxi market had changed and what relevant changes need to be made in order to alleviate this deficit. The company account for private hire is so short of any profit because although expenses have dictated them in a greater debt, the profit garnered from fees has fallen so short due to not high enough prices for PHV drivers. It could be inferred that greater expense in the PHV account is a direct result of higher demand and so greater expenditure has been necessarily spent to handle the influx.

This in mind, the money spent could be recovered by making the fees much fairer for both sides by increasing the PHV rate and lowering the Hackney rate but also bearing in mind the added benefits Hackney carriages have over PHV drivers but only charging them a small premium than the money hundreds you charge currently. This is a fair system and which means Hackney drivers a small premium for 'flag down' jobs and station work (they also pay their operator a fee for this) and as well as this, the operator income per private hire car and the operator fee should also work towards tackling the debt almost by itself even before you increase the PHV rates and make the Hackney rate much

The costs of all expenditure and income for Plymouth City Council Taxi Licensing Accounts are charged to separate class codes so that any costs incurred for drivers, vehicles and operators are kept completely separate. This is to ensure there is no cross subsidy between licences.

There are a lot more private hire drivers and the vehicle numbers are not restricted which means the costs can be divided up between a larger number. The recent unmet demand survey consultation showed an increase in support from the Hackney Carriage trade to keep the limit on the number of Hackney Carriage Vehicles.

All Local Authorities must charge based on actual costs of the trade and each fee must be reviewed based on the costs incurred.

more proportionate – what you'd lose from hackneys you'd gain from the far more abundant private hire cars..

I must say that to increase the rates for Hackney carriages when, already, the fees are some of the most extortionate in the UK is hard-nosed and brutish when the deficit lies in private hire drivers who populate a great deal of the taxiing market in this city but have less overheads whilst being able to access a vast market of customers.

Furthermore, if the numbers of private hire drivers are considerably bigger, why hike the Hackney carriages when there is a great opportunity to act advantageously on this increase of PHV drivers? The Department for Transport has noted the southwest to have over a twenty percent increase in PHV drivers whilst a five percent decrease in Hackneys so it would seem the trend of taxiing lies in the private hire sector.

Albeit the deficit being present in both accounts and I agree this must be addressed, the deficit lies in the vast difference in fees between Hackney carriages and private hire. It seems a small increase for a private hire driver to swallow but a massive increase for already high Hackney carriages - I would no doubt say some drivers may even question if it is worth continuing when the market share is growing in the private hires favour. It may be worth collecting such information to find how many drivers have thought of doing said change, how many are disheartened in the Taxi Licensing Authority and what improvements could be made. I am failing to see the need to appease the growing private hire sector. The market share is invariably growing to become theirs – look at the amount of private hire vehicles compared to

Hackney Carriages are also able to be pre-booked and there is nothing stopping a Hackney Carriage or a group of Hackney Carriages' having their own 'App'.

As advised above, the Private Hire accounts are not in deficit.

Hackneys and if this case be true then why not act advantageously on it? The deficit in the private hire account is already over thirty thousand pounds so it has to be found somewhere - not in the Hackney driver's pocket.

It is with this I must conclude and plead that you reassess your fee rises in order to fix the deficit of these accounts. Hackney Carriages are suffering the worst trade they have ever known in terms of 'flagging down' trade falling and the growing use of pre-booking apps.

Subjected to further price increases, private hire contemporaries are still paying just a fraction to profit off of relatively the same demand – private hire do have benefit of being flagged down and the train station access but this also needs investigation as to how feasible these are as beneficial points to the Hackney driver when the cost to have these benefits is incredibly high when private hire work is just as readily available.

A complete reassessment of the fee system is necessary and how fair it is on both types of drivers. An increase in the private hire sector would be a good start in improving the current debt and potential alienation of Hackney drivers who have already protested against increases before and are becoming ever more aware to the disadvantages of being a Hackney driver.

I agree expenses must be smaller than the income but if the biggest deficit lies in the private hire account, big changes need to be introduced to shrink this and as well as this there are clear opportunities to capitalize on a growing PHV industry.

It needs to be ensured drivers are all treated fairly. It would be fair enough to charge Hackney drivers a small premium to have the opportunity to sometimes be able to pick up off the side of

Following the Taxi Fees Review in March 2019, the Licensing Department asked the Devon Audit Partnership to formally review the taxi accounts. The Audit concluded that the accounts were found to be of a good standard and that the basis of apportionment of service income and expenditure across the five licence account categories has been clearly defined, is considered reasonable and ensures there is no cross subsidy. Please see the Summary Report in Appendix 3 of the 8 January 2020 Taxi Licensing Committee Report.

the road but a difference spanning into the hundreds is far beyond reasonability. I would understand a big increase in a bigger, much busier city but surveys and research need to be executed to see how used Hackney Carriages are for their intended purpose when compared to pre-booking apps such as Need-a-Cab, who

Table 4: Change in total driver licences (taxi-only, PHV-only and dual) by region between 2018 and 2019, England ([TAXI0103](#))

	Thousands			
	Total driver licences	Taxi driver licences	PHV driver licences	Dual driver licences
	<i>March 2019 figure and percentage change compared to March 2018</i>			
England	362.6 0.4%	53.5 -7.1%	226.8 1.6%	82.4 2.5%
North East	14.5 0.2%	3.4 -7.6%	7.7 6.7%	3.3 -4.8%
North West	48.7 -0.1%	10.0 -16.8%	30.4 5.6%	8.4 4.7%
Yorkshire and the Humber	29.6 4.6%	2.7 -2.1%	16.1 5.6%	10.8 4.8%
East Midlands	17.5 -1.6%	1.0 -28.6%	4.1 1.8%	12.4 0.5%
West Midlands	38.9 15.8%	3.4 -6.1%	25.4 24.8%	10.1 4.9%
East of England	25.0 1.1%	1.8 -3.3%	8.1 -0.6%	15.1 2.6%
London	129.9 -5.5%	23.2 -2.8%	106.8 -6.0%	0.0 0.0%
South East	39.4 2.3%	4.3 -3.9%	19.5 3.9%	15.6 2.3%
South West	19.1 8.4%	3.6 -4.8%	8.7 23.3%	6.8 0.1%

with their recent acquisition of a Hackney fleet, it is showing an alarming migration to pre-booked work and perhaps the first time in this city we have seen the popularity of PHV vehicles become the chosen choice over Hackney Carriages – look how many of the taxi ranks that used to be popular premises for drivers now lay dormant and defunct. I bring to your attention the recent survey by the Department for Transport which dictates how fast the taxi trade has grown in different areas of the United Kingdom – the southwest has one of the largest growths in the last year and some of that will be Plymouth.

The southwest, which a percentage would invariably be Plymouth had the largest increase in the 18/19 year for PHV licences. This is a massive statistic and if it were not for the West Midlands it would be the largest growing. It is only the exploitative regulations in Wolverhampton in the West Midlands that has meant people from all over the UK have been able to license themselves in the West Midlands as the laws are ridiculously lenient – this issue has been evident for a long time. As a final note, take note of the Hackney carriage percentage - a decrease nonetheless.

The PHV sector is growing at an alarming rate and a capital on this increase would only benefit the Taxi Licensing deficit and make trading much fairer as the private hire drivers, of which there is many more than Hackneys, are currently getting away with low rates and loads of work.

It is clear the evidence provided from the Ministry of Transport shows you'll be able to clear the thirty thousand deficit – the introduction of the newly proposed operator licence and 'per vehicle' fee operators now imposed are a step in the right direction but also a reassessment of PHV and Hackney rates is necessary to ensure both parties have a fair basis to work on as Hackney Carriages currently bear the brunt of what should be a fifty-fifty scenario.

SOURCES FOR FURTHER RESEARCH:

Department for Transport Survey:

		<p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833569/taxi-and-phv-england-2019.pdf</p> <p>Wolverhampton Taxi licensing scandal: https://www.bbc.co.uk/news/uk-england-birmingham-44849364</p>	
8	22/1/2020	<p>I am a hackney driver in Plymouth I wish to formally put in notification of protest against the proposed licence Hackney increases I think that the 85% increase that was put on our licences and other fees last year should be more than enough i do not think another 8% is appropriate.</p> <p>At this current time it is a struggle working 60 to 70 hours a week after paying out to be a licensed taxi I'm lucky to take home my £200 wage which is well less than the minimum wage which will council say that every person should own the minimum wage to live on.</p> <p>I feel this increase again is really going to hit the trade hard in the pockets and really really begin to bring down they already low moral of the taxi drivers in Plymouth at the moment</p> <p>I think seeing as we're technically being punished for bad financial management on your offices part with our budget which obviously is the cause for the decrease could be helped if the actual people who make the money in taxing IE the</p>	<p>Thank you for your email.</p> <p>The fees have been reviewed for this year and the Hackney Carriage fees need to be increased by 8% for vehicles and 15% for drivers to cover the costs incurred.</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p> <p>The costs of all expenditure and income for Plymouth City Council Taxi Licensing accounts are charged to separate class codes so that any costs incurred for drivers, vehicles and operators are kept completely separate. This is to ensure there is no cross subsidy between licences.</p> <p>The Council has presented the accounts as five separate trading accounts since March 2019. The Accounts are set out in the Taxi Licensing</p>

		<p>operators need to be charged more than £3 to £4 pound for a drivee maybe £10 to £15 all of our fees go up but there's a stayed the same which is unfair</p> <p>I feel that the council is being misfeasance in a public office against taxi drivers by punishing us and not the operator when all the money going in the same pot so one goes up the other should go up just victimizing is and not them in my opinion is being misfeasance in a public office.</p> <p>And maybe even cut the licensing officers that come out to enforce rules from 3 down to 2 as for the past couple of years due to sickness and non-filled positions we've been running at 2 two officers so I don't think 3 are needed that could already be a 20 to £30,000 savings.</p> <p>This is my formal PROTEST to the increase that I send to you.</p>	<p>Committee Fees report to reflect the five classes of licence and this will continue each year. The Taxi Committee report from Wednesday 8 January 2020 can be found at http://web.plymouth.gov.uk/modgov?modgovlink=http%3A%2F%2Fdemocrac.y.plymouth.gov.uk%2FieListDocuments.aspx%3FCId%3D566%26amp%3BMId%3D9108%26amp%3BVer%3D4</p> <p>The Operators fees have not increased as the account is covering its costs. Please see Appendix 2 of the Committee Report which shows each of the five accounts. The accounts are reviewed annually. The Operators fees cannot be used to subsidise other fees. Each fee must cover the costs of the particular licence.</p> <p>I can confirm that a taxi licensing officer has recently resigned and we are currently holding this vacancy until 1 April 2020. We will review this again in April to determine if we can cope without the third officer next year. These savings will then be taken into account when we review the fees again for next year.</p>
9	23/1/2020	<p>I am writing to you to object to the proposed increase in fees for both Hackney and Private hire taxis.</p> <p>Whilst I understand that annually there is a requirement for a proportional increase I feel that the proposed increase is disproportionate and is not at a level that we as drivers would be able to pass onto our customers.</p> <p>Our fares are either set by yourselves or by an operator. In the current economic climate we are not in a position to increase fares but yet we are expected to absorb the additional costs</p>	<p>Thank you for your email.</p> <p>The fees have been reviewed for this year and the Hackney Carriage fees need to be increased by 8% for vehicles and 15% for drivers to cover the costs incurred.</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire</p>

		<p>that this increase will incur. So therefore we are working the same hours for potentially less profit, or we work more hours to make the same profit as today. Either of these scenarios seem very unfair.</p> <p>Thank you for this opportunity to express my views.</p>	<p>accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p> <p>A letter was emailed to all Hackney Carriage drivers in September 2019. We received 12 responses and five of these 12 responses wanted an increase. Therefore out of 346 proprietors and 357 drivers, only 5 responded to say they would like the fares increased.</p>
10	27/1/2020	<p>I can't believe PCC want to make another increase in fees, for the taxi trade,</p> <p>It was only last year the council increased the fees by a HUGE amount, now only a few months later, another increase well above the inflation rate, unbelievable.</p> <p>How or why have these accounts been allowed to get into such a mess. Somebody has got it so wrong. When did the Hackney account go into a deficit, and by such a large amount, even though I can't find the figures, it must be large as of the increases are huge.</p> <p>I am strongly opposed to these rises, and wish this to be noted.</p>	<p>The fees have been reviewed for this year and the Hackney Carriage fees need to be increased by 8% for vehicles and 15% for drivers to cover the costs incurred.</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire Accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p>
11	27/1/2020	<p>Recently I've got a letter letting me know that PCC wants more money from my job. Before you ask for more money from us have you thought to do also something for us? Some of the disturbing things I find in this job: Forced to leave my car unattended to pick up passengers while members of the staff are playing games.</p>	<p>Thank you for your email. As detailed in the Committee report, the fees are reviewed annually to ensure the Private Hire accounts remain in balance.</p> <p>I appreciate that as part of your job you assist customers and I am pleased to hear you have excellent customer care.</p>

Helping customers outside in rain while they chat with a neighbour or so.
 Expectations from customers to lift heavy luggage while them or members of the family are sitting and watching you.
 Vulnerability in front of thieves and runners.
 No pickup points for PH drivers.
 Don't get me wrong I like to help customers and I always do but some circumstances makes me feel like a slave.
 Members of the council are paid from public money to take care of the ppl. Atm they are just wasting our money because of their incompetence and maybe laziness.

I would also like to know the salaries in taxi licensing office, I think is my right to know members of the council salaries.
 I would like to know why you put up our fee in the beginning, where the money is going.
 Also I would like to know my full rights as a private hire driver: I like to think that I'm a good driver but I have some strange situations:
 Customers request to be picked up or dropped of from bus stop or double yellow lines.
 And many more.

I moved in UK because I was always fascinated by the history of this country. I found here most welcoming ppl with manners. I've faced racist and dangerous situations in my car but never complained. I like the city and most of it's ppl but PCC is a shame for this city.

The department always ensure Private Hire Drop off points are considered with new developments within the city for example the bus station, Bar code. We have worked with the Parking Team to provide a number of drop off points in the City. A letter has been emailed to all Private Hire Drivers advising of these newly agreed drop off points.

The salaries charged to the trade accounts are contained in the Summary of Accounts in Appendix 2 of the Committee Report on 8 January 2020.

Full details about why the fees were increased last year can be found in the Taxi Committee Report on 21 March 2019 which is on our website at <http://web.plymouth.gov.uk/modgov?modgovlink=http%3A%2F%2Fdemocracy.plymouth.gov.uk%2FieListDocuments.aspx%3FCId%3D566%26amp%3BMid%3D8041%26amp%3BVer%3D4>

When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire

		<p>Continuing this way you will bring ppl together and then you will fail. A mass protest against on Mayflower event will not pass like that.</p> <p>Remember that this email is not against you in person nor taxi licensing, this email gathered all my feelings accumulated in my years as a taxi driver.</p> <p>Atm I don't feel anger for you anymore, I feel pitty and also I'm ashamed of PCC.</p> <p>I also had good experiences with PCC but not so many.</p> <p>It will be very nice if you take some time to answer to my questions.</p>	<p>accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p>
12	30/1/2020	<p>I am writing regarding the proposed fee increases for Hackney Carriage and Private Hire Fees.</p> <p>I think an 8% HC and 12 % PH fee increase is unacceptable.</p> <p>I understand the deficit in accounts, but increasing our fees is not the way to recoup this money. I suggest looking at government funds or any other avenues that might be available to assist with the deficit . Also, looking at the costs of running the office and where reductions could be made.</p> <p>At present, I am working over 50 hours a week and some weeks, struggle to make minimum wage with all my overheads !!</p>	<p>Thank you for your email.</p> <p>There are no government funds available for licensing regimes, however we are looking at ways to reduce costs across the service including staffing. One full time taxi enforcement officer has recently resigned and we are currently holding this vacancy until 1 April 2020. We will review this again in April to determine if we can cope without the third officer next year. These savings will then be taken into account when we review the fees again for next year.</p>
13	31/1/2020	<p>We write in response to your letter dated 10th January 2020 relating to the Proposed Licence Fees increase.</p> <p>The Licensing Authority will not be surprised to learn that we object to the proposed increases.</p>	<p>Thank you for your letter.</p>

This is mainly on two subjects.

Legal Department:

We have on many occasions brought to the attention of those in authority the following instances that have, and are, costing the Taxi Trade loss of earnings and excessive fees:

The Plymouth City Council Act 1975 S6. Roof signs on private hire vehicles.

6.—(1) No operator or proprietor of a private hire vehicle licensed under this Act shall cause or knowingly permit such private hire vehicle to have affixed thereto any roof sign of whatsoever design or nature illuminated or otherwise that would lead the public to suppose that the vehicle was a licensed hackney carriage.

(2) If any person contravenes the provisions of this section he shall be guilty of an offence and liable to a fine not exceeding one hundred pounds and to a daily fine not exceeding ten pounds.

Complaint: PCC as LA is failing to uphold and enforce the Act of Parliament that it created.

At the following Plymouth Crown Court Case it was stated:

**Plymouth Crown Court Case No: A19990007
21.09.1999**

**Key Cabs Ltd Appellant and Plymouth City Council
Respondent**

“...When cross-examined he {Mr. Shepherd} accepted that the sub-committee had not in fact considered whether the ban on advertising on the roof was “reasonably necessary” and said that aspect had not been considered.”

“...In the light of some of the evidence adduced before the Magistrates Key Cabs informed PCC on 15 January 1999 that it had changed its trading name from “TaxiFast” to “TF Value Cars” and wished to use the legend “Advance Bookings Only” on the side rear panels of its licensed PHVs. ...”

Complaint I: It is submitted that the fact that the Taxi and Private Hire Committee of the day did not consider the display of roof signs on PHV’s shows that the Committee was poorly advised by the Legal Department.

Department for Transport

**TAXI AND PRIVATE HIRE VEHICLE LICENSING:
BEST PRACTICE GUIDANCE**

March 2010

Vehicle Identification

Complaint I: This case is not relevant to this review of licence fees as costs incurred in this case do not form part of this review. The case quoted was subsequently appealed to the High Court where an Order was made requiring the Council to have roof signs on private hire vehicles and we are obliged to follow that order.

38. Members of the public can often confuse PHVs with taxis,

But it can be argued that any roof-mounted sign, however unambiguous its words, is liable to create confusion with a taxi. So roof-mounted signs on PHVs are not seen as best practice.

Complaint 2: The Licensing Authority continues to ignore the DoT guidance at the expense of the Taxi Trade.

Key Cabs Limited t/a Taxifast v Plymouth City Council CO/4369/2006

**High Court of Justice Queen's Bench Division
Administrative Court**

8 November 2007

8 By a complaint lodged in the Plymouth Crown Court, the appellant identified the matter of complaint as follows:

“(1) On the 18th May 2003 the Complainant Company applied to the Respondent Authority for 30 hackney carriage vehicle licences.

(2) On the 21st July 2004 the Complainant Company submitted a Peugeot Euro 7 vehicle, registration number SF04 RJJ, to the Respondent Authority for plating and licensing as a hackney carriage.

Hackney carriages and private hire vehicles are clearly distinguished by their appearance and different plates/door stickers.

Complaint 2: Christmas safety message on social media which explained the difference between a taxi and a private hire vehicle. The public tend to use the phrase ‘taxi’ for both trades and this is common across the country. This does not have an impact on the setting of the fees.

(3) By a letter dated 21st July 2004, the Respondent Authority informed the Complainant Company that it had refused the hackney carriage licence for the submitted vehicle.

Complaint 3: The reason that PCC refused the licence was one of numeracy however the vehicle was not Taxi Specification Compliant. There should have been no court case.

Plymouth City Council

HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICY 2018

10.0 Conditions of Driver Licence

10. 2 Regulation of hackney carriage drivers is achieved through the use of byelaws. The Secretary of State for Transport has approved a set of byelaws to regulate the hackney carriage trade operating within the City of Plymouth. These byelaws became effective from the 14 July 2009 and will remain in place until such time as they are updated or replaced.

Complaint 4: On the basis of the Licensing Authority's Policy a Licensee wished to appeal against the use of Conditions of Licence. The Legal Department used an out of house solicitor specialising in Taxi Law to prevent the Appeal taking place. The Legal and Licensing Departments are not complying with their own Policy.

Complaint 3: Key Cabs Ltd 2007 Case

This is not relevant to this review of licence fees as the costs incurred do not form part of this fees review, however members of the trade will recall that this related to the defence of a claim against the council's policy in respect of hackney carriage vehicle licences; the trade supported the council's position and the council were successful.

Complaint 4: The case you are referring to is where a driver lodged an appeal to the Plymouth Magistrates Court claiming that Plymouth City Council had made 'conditions' on Hackney Carriage Drivers which the Council were not permitted to do, in particular for the dress code, enhanced training and a resultant penalty points system. The driver argued

We are not complaining about the day to day running of the Legal Department and the procedures used at the Taxi and Private Hire Licensing Committee which we find conducive to fair hearings.

that conditions could not be attached to a taxi driver licence and that drivers could only be regulated by the Council amending its byelaws.

Despite the Council and South and West Devon Magistrates Court advising the driver in May 2018, that the Policy needed to be appealed by way of Judicial Review to the High Court, the driver was determined to pursue the appeal.

James Button, Specialist Taxi Licensing Solicitor, represented the Council and advised the Court that the Taxi Licensing Policy can only be challenged by means of judicial review in the High Court. The existence of the policy cannot be challenged in the Magistrates Court, who must accept the existence of that policy and then determine their judgement in the light of it. Mr Button, confirmed that no condition had been attached to the Hackney Carriage Drivers licence.

The Court Clerk (Legal advisor) advised the bench that the Court has no jurisdiction to hear this case and that the driver had been informed of this from the outset when the court replied to his request in May 2018. The Clerk added that the law is clear and no conditions can be attached to a drivers Hackney Carriage licence and no conditions have been added, therefore the court had no power to hear this appeal or to make any recommendations with regards to this matter. The law must be applied and there is nothing to appeal against. This matter was regarding the policy and an appeal must be via a judicial review. Plymouth City Council have not attached conditions to the persons drivers licence and the court concluded that there was no appeal to be heard. The law allows local authorities to have policies and this is not a condition. The Court cannot regulate local authority policies and this would be a judicial review at the high court.

Complaint 5: Through poor judgement the Legal Department has incurred a debt of approximately £160,000 to the Taxi Accounts thereby artificially creating a huge increase in Licence Fees.

Yet again we draw attention to the **Plymouth City Council Act 1975**

Fees for vehicle and operators' licences.

28.—(1) Subject to the provisions of subsection (2) of this section, the Council may charge such fees for the grant of vehicle and operators' licences as may be resolved by the Council from time to time and as may be sufficient in the aggregate to cover in whole or in part—

Complaint 6: Staff persist in misinforming Councillors that the whole cost of Licensing the two trades has to be recouped through fees. This is incorrect. The reason for Licensing is to protect the general public. We request that due to the poor judgement of the Legal Department a one off payment is made

In deciding the matter, the Court dismissed the appeal and the Council made an application for costs and were awarded £3300. These costs are being paid by the driver and are returned directly to the Hackney Carriage accounts.

Complaint 5: Please see comments above.

Complaint 6: A recent judgement has confirmed that there is no general principle of law that the licensing regime should be self-financing, however it was considered that the costs of monitoring and enforcing the behaviour of licensed drivers can be recovered through the driver's licence fee as long as there is no cross subsidy between licences.

from the General Rate Fund to normalise the Taxi Trade Accounts.

Licensing Department:

In 1976 one Inspector issued all licences and patrolled the streets ensuring that enforcement was properly carried out. It was realised that this was too much for one person and so for many years there were two members of staff who competently carried out their duties.

We now have the equivalent of six full time Staff. There is virtually no enforcement and that is largely reactive and not proactive with the result that many licensed vehicles and drivers fail to comply with Licensing Authority Policy.

The costs of all expenditure and income for Plymouth City Council Taxi Licensing Accounts are charged to separate class codes so that any costs incurred for drivers, vehicles and operators are kept completely separate.

Licensing Department

The number of licences and the type of issues faced in 1976 is not comparable with 2020.

As detailed in section 4.5 of the 8 January 2020 committee report, the three taxi enforcement officers undertake proactive and reactive work. In financial year 2018/19, the three Taxi Enforcement Officers undertook 523 vehicle inspections of which 168 (32%) were Hackney Carriage (HC) vehicles and 355 (68%) were Private Hire (PH) vehicles. Officers investigated 80 complaints regarding HC drivers and 82 complaints regarding PH drivers. There are 357 HC drivers and 801 PH drivers so we are getting complaints regarding 22% of the HC drivers compared to 10% of the PH drivers. Officers investigated 13 complaints regarding HC vehicles, 14 complaints regarding PH vehicles and five complaints regarding PH operators. These complaints resulted in 11 HC drivers going to committee and five PH drivers going to committee based on the complaints received.

Complaint 7: The Licensing Department appears to be the only growth area within Plymouth City Council. The Licensing Authority should reduce the number of staff employed.

The Ambassador course; while PCC receives funding to train staff self-employed licensees are required to attend at their own expense.

SI 1994 No. 1519 at Interpretation general 4. “taxi” means (a) in England and Wales, a vehicle licensed under (i) section 37 of the Town Police Clauses Act 1847^[16];

Complaint 8: The Licensing Authority refuse to differentiate between the Taxi and Private Hire trades creating confusion amongst the public and loss of revenue to the legally defined Taxi Trade.

Plymouth City Council Web Site

Taxi Ranks and Fares

We license two different types of taxi:

- Hackney carriages: These are usually London style taxis and can pick up from taxi ranks, be flagged down in the street or be pre-booked.
- Private hire vehicles: These are usually saloon cars or people carriers and must be pre-booked; they can't use a taxi rank or be flagged down.

Complaint 7: The licensing department has not had any increase in staff and are currently holding a vacancy of 1 FTE Taxi Enforcement Officer.

No funding was available to provide the courses to the taxi drivers. The cost of the course was included in the driver's fee last year and is included in the new applicant's fee from 1 April 2020.

Complaint 8: The Licensing Authority ensure that there is clear difference between a taxi and a private hire vehicle licence.

Complaint 9: This is not legally possible, the Licensing Authority is deliberately confusing the general public

Complaint 10: Where staff are paid to perform a task Licensees are then required to pay twice for their time and stationery.

Complaint 11: A Licensee was refused permission to Appeal against a Suspension because he did not have a headed letter notification to present to the Magistrates Court.

Complaint 11: Licensee confidentiality is being compromised by double sided letters being sent to two licensees.

While we can accept that these errors are largely due to a computer programme it remains a fact that Licensees are, in this

Complaint 9: The wording has been altered slightly to make this clearer and has been changed to:

We are responsible for licensing the following vehicles carrying up to and including eight passengers:

- Hackney Carriage Vehicles: these are usually London style cabs known as taxi's, and can be flagged down in the street or pre-booked.
- Private hire vehicles: These are usually saloon cars or people carriers and must be pre-booked; they can't use a taxi rank or be flagged down.

Complaint 10: This is not correct. All costs incurred are charged to the specific taxi licensing account and are recovered through the individual fees.

Complaint 11: If a driver is suspended by the Taxi Licensing Committee, they receive a formal letter from the Council which they can present to the Magistrates Court.

Complaint 11: There was an incident in 2019 where letters had been sent out double sided in error. This was not the responsibility of the Licensing Department as bulk letters are dealt with by the Council's printing service. This matter was investigated by the Information Governance Manager.

		<p>writers opinion, currently administered by the least efficient Licensing Department since 1976.</p> <p>For all of the above reasons it is our opinion that there should be a large reduction in the Licence Fees for Taxi Trade Licensees.</p>	
14	02/2/2020	<p>I am writing to you with great displeasure because of your plans to keep increasing the taxi licensing fees. When will it stop? Last year you had great increases! How far will it go?</p> <p>I understand you have loses in your department. But, how about cutting some of the staff down and reduce costs?! We, the drivers, are the ones always paying for your bad managerial ideas. If a drivers does something wrong that goes against the taxi bylaws, he will be hold to account. Regarding your poor choices, why aren't you held to account?! Few years back, we were doing great; we were ahead financially (the department). What happened? Who made bad choices that now affect 1.000's?! Why aren't you made to pay for the loses?</p> <p>There is a joke now in the taxi ranks: in order to become a taxi driver, one will have to get a bank loan! It doesn't seem to me that there is a long queue of people waiting to become taxi drivers.</p> <p>Instead of making things easier for us, you are only complicating them more. I don't want to end up paying 500 GBP for a 3 year HCDL! In no way do I agree with your increases. As I understand, the taxi licensing department is funded by the</p>	<p>Thank you for your email.</p> <p>The fees have been reviewed for this year and the Hackney Carriage fees need to be increased by 8% for vehicles and 15% for drivers to cover the costs incurred.</p> <p>Full details about why the fees were increased last year can be found in the Taxi Committee Report on 21 March 2019 which is on our website at http://web.plymouth.gov.uk/modgov?modgovlink=http%3A%2F%2Fdemocracy.plymouth.gov.uk%2FieListDocuments.aspx%3FCId%3D566%26amp%3BMId%3D8041%26amp%3BVer%3D4</p> <p>When the taxi fees were raised in March 2019, the committee reports advised that this was a five year process and the fees would have to be increased each year to ensure the Hackney Carriage accounts are out of deficit by the end of the financial year 2023/2024 and the Private Hire Accounts all remain in a surplus position. The fees are reviewed annually and are increased as required based on the actual costs incurred.</p>

	<p>drivers. So, if out of our pockets you get your salary, why don't we ever have a say in the way you run your department?!</p> <p>You will have a lot of drivers that will not respond to this inquiry; not because they don't care, but because they are disgusted with the kind of treatment they got in the past.</p>	
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