

## Appendix 3a

<b>B) Summary of Consultation Comments on Deregulation to Taxi Licensing</b>						
<b>Response</b>	<b>Option A – Less Staff Resource</b>	<b>Option B – Same Staff Resource</b>	<b>Option C – Low Fee Option to Attract More Licences</b>	<b>Is Knowledge Test Required</b>	<b>Option D – Another Option to be Proposed</b>	<b>Capacity</b>
B1	No comment	No comment	No comment	Yes	No comment	Driver
B2	No comment	Yes	No comment	Yes	No comment	Driver
B3	No comment	No comment	No comment	Yes	No comment	Driver
B4	No Comment	Yes	Disagree strongly	Yes	No Comment	Driver
B5	No comment	No comment	No comment	Yes	No comment	Driver
B6	No comment	Yes	No comment	Yes	No comment	Driver
B7	No comment	No comment	No comment	Yes	No comment	Driver
B8	No comment	No comment	No comment	Yes	No comment	Driver
B9	No comment	No comment	No comment	Yes	No comment	Driver
B10	No comment	No comment	No comment	Yes	No comment	Driver
B11	No comment	No comment	No comment	Yes	No comment	Driver
B12	No comment	No comment	No comment	Yes	No comment	Driver/Operator
*B13	No comment	No comment	No comment	No	No comment	Driver/not DCC
B14	Yes	No Comment	No Comment	No comment	No comment	Driver
B15	No comment	No comment	No comment	Yes	No comment	Driver

B16	No comment	No comment	No comment	Yes	No comment	Driver
B17	No comment	Yes	No comment	Yes	No comment	Driver
B18	No comment	Yes	No comment	Yes	No comment	Driver
B19	No comment	No comment	No comment	Yes	No comment	Driver
B20	Yes	No comment	No comment	Yes	No comment	Driver
B21	No comment	No comment	No comment	Yes	No comment	Driver
B22	No comment	No comment	No comment	Yes	No comment	Driver
B23	No comment	No comment	No comment	Yes	No comment	Driver
*B24	No comment	No comment	No comment	No	No comment	Derby Remapping
B25	No comment	No comment	No comment	Yes	No comment	Driver
B26	No comment	No comment	No comment	Yes	No comment	Driver
B27	No comment	Yes	No comment	Yes	No comment	Driver
B28	No comment	No comment	No comment	Yes	No comment	Driver
B29	Decrease Admin but not Compliance	Decrease Admin but not Compliance	No	Yes	No comment	Driver
B30	No comment	No comment	No comment	Yes	No comment	Driver
B31	No comment	Yes	No comment	Yes	No comment	Driver
B32	No comment	No comment	No comment	Yes	No comment	Driver
B33	No comment	No comment	No comment	Yes	No comment	Driver

B34	No comment	No comment	No comment	Yes	No comment	Driver
B35	No comment	No comment	No comment	Yes	No comment	Driver
B36	No comment	No comment	No comment	Yes	No comment	Driver
B37	No comment	Yes	No comment	Yes	No comment	Driver
B38	No comment	No comment	No comment	Yes	No comment	Driver
B39	No comment	Yes	No comment	No	No comment	Driver
B40	No comment	No comment	No comment	No	Yes	Driver
B41	No comment	Yes	No comment	No comment	No comment	Driver
B42	No comment	No comment	No comment	Yes	No comment	Driver
B43	No comment	No comment	No comment	Yes	No comment	Driver
B44	No Comment	Yes	No comment	Yes	No comment	Driver
B45	No comment	No comment	No comment	No	No comment	Driver
B46	No comment	No comment	No comment	Yes	No comment	Driver
B47	No comment	No comment	No comment	Yes	No comment	Driver
B48	No comment	No comment	No comment	Yes	No comment	Driver
B49	No comment	No comment	No comment	No	No comment	Operator
B50	No comment	No comment	No comment	No	No comment	Driver
B51	No comment	No comment	No comment	Yes	No comment	Driver
B52	No comment	No comment	No comment	Yes	No comment	Driver

B53	No comment	No comment	No comment	Yes	No comment	Driver
B54	No comment	No comment	No comment	Yes	No comment	Driver
B55	No comment	No comment	No comment	Yes	No comment	Driver
B56	No comment	No comment	No comment	Yes	No comment	Driver
B57	No comment	No comment	No comment	Yes	No comment	Driver
B58	No comment	No comment	No comment	Yes	No comment	Driver
B59	No comment	No comment	No comment	Yes	No comment	Driver
B60	No comment	No comment	No comment	Yes	No comment	Driver
B61	No comment	No comment	No comment	Yes	No comment	Driver
B62	No comment	No comment	No comment	Yes	No comment	Driver
B63	No comment	No comment	No comment	Yes	No comment	Driver
B64	No comment	No comment	No comment	Yes	No comment	Driver
B65	No comment	No comment	No comment	Yes	No comment	Driver
B66	No comment	No comment	No comment	Yes	No comment	Driver
B67	No comment	No comment	No comment	Yes	No comment	Driver
B68	Yes	No comment	No comment	Yes	No comment	Driver
B69	No comment	No comment	No comment	Yes	No comment	Driver
B70	Yes	No comment	No comment	Yes	No comment	Driver
B71	No comment	Yes	No comment	Yes	No comment	Driver

B72	No comment	No comment	No comment	Yes	No comment	Driver
B73	No comment	No comment	Yes	Yes	No Comment	Driver
B74	No comment	No comment	Yes	Yes	No Comment	Driver
B75	No comment	No comment	Yes	Yes	No Comment	Driver
B76	Yes	No	No	Yes	No comment	Driver
B77	No comment	No comment	No comment	Yes	No comment	Driver
B78	No comment	No comment	No comment	Yes	No comment	Driver
B79	No comment	No comment	No comment	Yes	No comment	Driver
B80	No comment	No comment	No comment	Yes	No comment	Driver
B81	No comment	No comment	No comment	Yes	No comment	Driver
B82	No	No	Yes	Yes	No comment	Representative of Albatross Cars Ltd and Chads Cars Ltd
<b>**B83</b>	No comment	No comment	No comment	Yes	No comment	DHU
<b>**B84</b>	No comment	No comment	No comment	Yes 166 x HC drivers 45 x PH drivers 16 x Unknown (No. only) 2 x PH Operators 228 x Total	No comment	Petition from DATOA with 228 signatures, 45 of which were private hire drivers
<b>Results</b>	76 x No Comment = 92%  5 x Yes = 6%	68 x No Comment = 82%  12 x Yes = 15%	76 x No Comment = 92%  4 x Yes = 5%	74 x Yes = 89%  2 x No comment = 2%	82 x No Comment = 99%  1 x Yes = 1%	N/A

	1 x Decrease Admin but not Compliance = 1%  1 x No = 1%	2 x No = 2%  1 x Decrease Admin but not Compliance = 1 %	2 x No = 2%  1 x Strongly Decrease = 1%	7 x No = 9 %		
<b>Officer Comments</b>	<p>A significant majority of respondents to this consultation did not make any specific comments about any of the options proposed and did not propose any other options. The majority of the comments received were about the continuation of the knowledge test and 89% of respondents wanted this to be retained.</p> <p>Option A is the preferred option as this was advertised and is anticipated to reflect the staffing levels required following the introduction of the deregulation legislation. Option B sets out the costs of the service without any reductions to staffing levels. The purpose of Option C was to consider the introduction of a low cost fee option designed to attract licences from outside the city. In order for the costs to be significantly lower, the amount of additional licences that would be required is unrealistic and is therefore no longer considered an option. No alternative options have been proposed under Option D so no costs have been included. Further work has been carried out on refining the fees and charges to ensure they reflect the costs of providing the service. They will apply from 1 October 2015 to 31 March 2016 and the exercise will be repeated again to calculate the fees and charges for 2016/17.</p> <p>In relation to the knowledge test, currently, all hackney carriage and private hire drivers that are licensed in Derby must successfully pass a knowledge test as part of the licence process. This arises because the governing legislation requires that licence holders must carry passengers via the shortest possible route within the licensing area, and must be able to demonstrate their ability to do so.</p> <p>From 1 October 2015, operators of private hire (Minicab) businesses in Derby will be able to legitimately sub-contract work to other private hire (Minicab) businesses elsewhere in the country. This results in a situation whereby vehicles and drivers that are not from, or familiar with, the area are working alongside Derby licensed drivers who, if the situation remains the same, have to complete a knowledge test as a prerequisite to obtaining a licence.</p> <p>Members will be aware that a similar situation already exists whereby hackney carriage drivers and vehicles licensed by other local authorities who are not familiar with the area are undertaking private hire work in Derby without the need to complete the Derby knowledge test.</p> <p>Legal advice has been sought, which identifies that the continued requirement for a knowledge test in light of these legislative changes could lead to challenges on the grounds of a 'restriction of trade'. It also affirms the current legal position in relation to the continued need to retain the requirement for hackney carriage drivers to continue to undertake a knowledge test, in the absence of any alternative means for them to demonstrate local knowledge, in accordance with the law.</p>					
<b>Officer Recommendation</b>	To approve Option A and, in relation to the knowledge test, retain it pending further clarification on the impact the deregulation changes have in practice.					

\*Rows greyed out at B13 and B24 have been received from respondents not allowed to take part in the consultation.

\*\*Rows greyed out at B83 and B84 have been received from two local hackney carriage trade associations who have not provided all the necessary information required by the Council to be officially recognised.