

## **Identification of taxis and private hire vehicles entering charging Clean Air Zones**

**November 2018**

### **About the District Councils' Network**

The District Councils' Network (DCN) is a cross-party, member-led network of 200 district councils. We are a Special Interest Group of the Local Government Association (LGA), and provide a single voice for district councils within the Local Government Association.

District councils in England deliver 86 out of 137 essential local government services to over 22 million people - 40% of the population - and cover 68% of the country by area.

District councils have a proven track record of building better lives and stronger economies in the areas that they serve. Districts protect and enhance quality of life by safeguarding our environment, promoting public health and leisure, whilst creating attractive places to live, raise families and build a stronger economy. By tackling homelessness and promoting wellbeing, district councils ensure no one gets left behind by addressing the complex needs of today whilst attempting to prevent the social problems of tomorrow.

All district councils are responsible for licensing of taxis and private hire vehicles and are therefore directly affected by the proposals in this consultation paper.

### **Summary**

The DCN welcomes the opportunity to comment on this consultation paper.

We welcome in particular that the Department has recognised that the proposals involve a new burden for councils and that it has undertaken an assessment of the costs. Our principal concern is that the cost of implementing the change to the new system has not been properly assessed, particularly in respect of the initial upload of extant data.

### **Detailed responses**

**Question 1: In your view is the creation of a central database to collect and host specific taxi and Private Hire Vehicle data an appropriate way of addressing the difficulties associated with differentiating these types of vehicles from private vehicles in support of charging Clean Air Zones? If not then why not? Please provide any evidence in support of your answer.**

Yes, a centralised database seems a reasonable solution. However, it is important that Government meets any additional costs for councils of providing the data for a central database – both initially and on an ongoing basis.

**Question 2: Do you have any comments on the proposed use of powers under the Environment Act 1995 to mandate all licensing authorities in England and Wales to provide the taxi and PHV data to the database?**

It would have been helpful if the consultation paper had explained which powers the Government intends to use in order to mandate councils to provide the data. We assume this will involve regulations under section 87 of the Environment Act 1995. We would welcome consultation on the draft regulations in due course.

**Question 3: What do you see as the main technical barriers to successfully bringing together licensing data on taxis and PHVs into one national database? What evidence do you have, if any, of potential approaches that would address these barriers?**

The process would work most smoothly and efficiently if it involves a simple and resource minimal process for the collection of data. We envisage that the collection of number plate data would be sufficient for the purpose of this exercise. Should further data be required, there must be clear justification for doing so and appropriate funding to allow for any additional burden.

**Question 4: Do you feel the proposal that LAs should provide taxi data on a weekly basis as a minimum are, or are not, appropriate? If not, what frequency do you feel is an appropriate minimum (please provide any evidence you may have in support of your answer). Do you have any other comments on the frequency with which local authorities should provide taxi data to the database?**

A weekly update seems reasonable. We assume that the data to be provided would simply be that week's additions and deletions, not an upload of the entire data on a weekly basis.

**Question 5: What additional vehicle data should licensing authorities be required to submit in order to validate the taxi and PHV data? What evidence do you have, if any, that this additional data would provide effective validation?**

None. See answer to question 3.

**Question 6: What additional vehicle data do you feel should be collected in order to facilitate exemptions of certain types of taxi or PHV from a charge, if any?**

None. See answer to question 3.

**Question 7: Do you agree with the assumptions made in the Regulatory Triage Assessment? If no, please provide supporting evidence.**

In part, yes. The assumptions about the proposed weekly update do not seem unreasonable. It is presumed that this relates to the task of uploading details of that week's newly registered PHVs/taxis and also of those that have been deregistered.

However there will be a need for an initial data upload of the registration numbers of 280,000 vehicles across England, of which somewhere between a third and a half will be registered by district councils. We do not believe that the Department has adequately assessed the staff time and other costs that relate to preparation for and submission of this initial data upload. The staff time is likely to be far more significant than for an upload of a weekly update. It may be possible to estimate this by working out approximately how many vehicles would be the subject of weekly uploads in a 12 month period ("annual changes") and dividing the estimated costs of £188k by that number and then multiplying by 280,000 (for England), thus:

$$\text{Staff costs for initial upload} = \frac{\text{£188k}}{\text{Estimated number of annual changes}} \times 280,000$$

However there may be other costs than staffing to address. Depending on how the data are currently held, and what format and method are to be used for loading data to the central database, there may be other initial costs such as data conversion, adjustments to software, writing of code to automate the process as far as possible etc. These costs are not easy to estimate without precise information about the proposed approach, and will also not necessarily fall evenly across councils.

We would encourage further discussion with the Licensing Working Group on this matter.

**Question 8: Do you agree with the resulting conclusions of the Regulatory Triage Assessment? If no, please provide supporting evidence.**

No – please see comments on question 7.

**Question 9: Are you aware of any additional data that could inform the Regulatory Triage Assessment? If yes, please give details.**

See response to question 7.

**Question 10: If you have any further comments you would like to make on the government's approach to enabling local authorities to impose relevant charges on taxis and PHVs, please provide them here.**

We have no further comments.