

*promoting quality public transport.....*

16<sup>th</sup> December 2010

## **Submission to the House of Commons Transport Committee on the Licensing of Taxis and Private Hire Vehicles.**

1. TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing users of all forms of public transport in NW England. We consider that hackney carriage vehicles (taxis) and private hire vehicles (PHVs) are integral components of public transport provision.

2. However the general prohibition from their charging **separate fares**, albeit relaxed <sup>1</sup> in a limited number of prescribed circumstances, does not remove the significantly constraining requirement that such separate fares, unlike bus fares, are **subject to VAT**.

3. Whilst taxis can ply for hire on streets and at ranks, nowadays many of their intending passengers have mobile phones which can be used to “hail a cab”. This makes the justification for maintaining a legal distinction between taxis and PHVs, which can only be pre-booked, rather debatable.

4. Neither does there seem to be any strong rationale for the situations in which -

- ◆ Local Licensing Authorities are able to restrict <sup>2</sup> the number of taxis, but not of PHVs, both of which they licence, and
- ◆ Small passenger carrying vehicles (SPCVs) with eight or less passenger seats can be used variously under a restricted PSV Operators’ Licence issued by the Traffic Commissioners or a Taxi/PHV Licence issued by a Local Licensing Authority.

5. The creation of a **single category of SPCV Licence** issued by the same Licensing Authority (possibly the Traffic Commissioners) might help to untangle the present complicated and restricting legislation.

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<sup>1</sup> Transport Act 1985 and Local transport Act 2008

<sup>2</sup> Taxi Licensing Authorities may restrict the number of licensed taxis where there they can show that there is no “unmet demand”

## **Taxi Buses**

6. TWNW was pleased to see an extension to PHVs of the relaxation<sup>3</sup> allowing the carriage of passengers at separate fares on registered local services provided by taxi operators who can obtain a Special Restricted PSV Operator Licences<sup>4</sup>.

7. With the probability that reductions in BSOG and concessionary travel reimbursement will lead to deregistrations of what were previously commercially registered local services and the uncertainty of Local Transport Authorities being able to afford to secure their replacement, the possibility of taxi buses being procured at less expense to fill this gap should be pursued.

### **Taxi Bus trials.**

8. The trial, announced by DfT in summer 2010, of taxi buses in rural areas could well be extended to other appropriate areas, such as suburbs deprived of evening and Sunday services. Services can now be registered more flexibly than previously. TWNW would be pleased to assist in monitoring any such trials in the NW.

### **Cross Boundary issues.**

9. Taxis and PHVs are currently licensed by over 300 District and Unitary Authorities. They could also be licensed (as are PSVs) by the Traffic Commissioners or by larger City Region Combined Authorities as provided for by the Democracy and Local Government Act 2009 and/or the current Localism Bill. Both strategies would create a single Licensing Authority for all SPCVs - TWNW prefers the former suggestion but either would help address the Boundary issues illustrated in the following case study.

### **Case Study – Manchester Airport**

10. The Airport is in West Cheshire. Taxis arriving there to set down passengers from another licensing area, such as one of the ten metropolitan boroughs in Greater Manchester, cannot then go on to Airport ranks and pick up a return load of passenger(s) departing the Airport.

11. This is a wasteful and unsustainable use of a valuable transport resource.

### **Quality and Safety**

12. Standards vary between Local Licensing Authorities. Larger licensing areas might help to address this issue. The use of Special Restricted PSV Operators' Licenses to provide taxi buses is allowed by the Traffic

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<sup>3</sup> of the provisions in the Transport Act 1985 made by the Local Transport Act 2008

<sup>4</sup> issued by Traffic Commissioners (Local Transport Act 2008)

Commissioners on the grounds that “taxis and PHVs are subject to equivalent but not identical”<sup>5</sup> quality and safety controls to PSVs.

13. If the Traffic Commissioners were to fulfil this role they would need their present resources<sup>6</sup> (which are woefully inadequate to monitor just PSV Quality and Performance) vastly increased.

14. TOWNW would be prepared to expand on these observations either orally or in writing, and to assist with any taxi bus trials in the NW.

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<sup>5</sup> “Guide to the Transport Act 1985” DfT 1986

<sup>6</sup> effectively VOSA’s resources