

APPENDIX 1

Peterborough Taxi and Private Hire Licensing Consultation Document

Part 2 – Vehicle Testing

Depending on the outcome of the consultation, a combination of the following may be adopted.

1. Remove the requirement for a vehicle to have an MOT exemption test.
2. Remove the requirement to book a test via the licensing department.
3. Remove the requirement for a vehicle to be tested at the Unity or Enterprise testing centres.
4. Introduce the requirement to have a standard MOT test.
5. Introduce the requirement to book the MOT test direct with the test centre.
6. Introduce a “vehicle testing centre scheme” consisting of VOSA authorised MOT testing stations that can meet additional criteria as set by the council.
7. Retain the requirement for a vehicle to have an MOT exemption test.
8. Retain the requirement to book a test via the licensing department.
9. Retain the requirement for a vehicle to be tested at the Unity or Enterprise testing centres.
10. Other options deemed suitable as suggested through the consultation process.

1. Introduction and Objectives

Introduction

There are currently 185 Hackney Carriage and 500 Private Hire vehicles licensed in Peterborough. All vehicles are currently required to pass the MOT exemption test prior to being licensed, and then on an annual basis at the time of the renewal of the vehicle licence. On reaching 6 years of age from the date of first registration as indicated on the V5 document the vehicle is required to be tested every 6 months.

The MOT exemption test covers additional items including, the spare tyre, wheelchair ramp where appropriate, airbag lights, first aid kit, fire extinguisher, reversing lights and the fare card.

This document sets out options for the Hackney Carriage and Private Hire Vehicle testing arrangements in Peterborough. It is a consultation document and comments are invited from all those who could be affected by the proposals.

Objectives

This consultation has the following main aims.

1. To fulfil the councils commitment to ensure that its policy for Hackney Carriage and Private Hire licensing is current and fit for purpose.
2. To ensure the licensing service is efficient and cost effective offering value for money to its service users.
3. To simplify arrangements and reduce the administrative burden on drivers and the council without compromising safety standards or reducing the quality of licensed vehicles.

2. Background and Present Arrangements

Fees

The council has the delegated powers to set fees in relation to Hackney Carriage and Private Hire Vehicle licensing functions, they cannot be used to raise revenue or to make a profit for the council; they can only be set to cover the cost incurred by the licensing function.

Currently the annual renewal fee for a Hackney Carriage Vehicle licence is £210 including the annual test, the annual renewal fee for a Private Hire Vehicle licence is £180 including the annual test. The current fee for the 6 month test for both Hackney Carriage and Private Hire Vehicles is £65. Where a vehicle fails a test there is a fee of £21 for the 3rd and subsequent re-tests if tested within 14 days, and £42 if tested after 14 days.

Current Process

As part of the vehicle licence renewal process reminder packs are sent out to vehicle licence holders 1 month in advance of the renewal date. Licence holders are advised to contact the taxi licensing team in order to make an appointment for the vehicle to attend one of the two designated testing stations in order for the MOT exemption test to be carried out.

3. OPTIONS

Option 1:

Introduce the requirement to have a standard MOT test carried out by any VOSA authorised MOT testing station instead of the requirement for an MOT exemption test carried out by either of the councils 2 testing stations.

- a. Remove the requirement for a vehicle to have an MOT exemption test.
- b. Remove the requirement to book a test via the licensing department.
- c. Remove the requirement for a vehicle to be tested at the Unity or Enterprise testing stations.
- d. Introduce the requirement to have a standard MOT test carried out by any VOSA authorised MOT testing station.
- e. Introduce the requirement for the driver to book the MOT test direct with the testing station.

Advantages

1. Will simplify current arrangements and partially reduce the administrative burden on both the driver and the council.
2. Will help to reduce the number of routine interactions between the driver and the council and hence help reduce any inconvenience or loss of income by avoidable contact with the council.
3. Will contribute to a more cost effective service freeing up resources enabling issues to be dealt with in a more timely fashion.
4. Encourage competition and therefore generate a more competitive pricing structure and market place.
5. Will provide flexibility for drivers offering an increased availability of test

appointments.

Disadvantages

1. The council will not have access to analytical data in regards to MOT failures in order to identify where specific vehicles fail tests frequently.
2. Additional vehicle test requirements that are currently subject to testing under the councils MOT exemption test regime are not tested as part of a standard VOSA MOT test requirements; these items whilst not being considered crucial to the mechanical safety of the vehicle, for safety purposes are deemed appropriate for passenger and driver safety. They include the certification of the fire extinguisher, first aid kit, fare card, and the safety testing of the wheelchair ramp where appropriate.

Option 2:

Introduce the requirement to have a standard MOT test carried out by only VOSA authorised MOT testing stations which are members of the councils "vehicle testing centre scheme" instead of an MOT exemption test carried out by the councils 2 test stations.

- a. Remove the requirement for a vehicle to have an MOT exemption test.
- b. Remove the requirement to book a test via the licensing department.
- c. Remove the requirement for a vehicle to be tested at the Unity and Enterprise testing stations.
- d. Introduce the requirement to have a standard MOT test carried out by VOSA authorised MOT testing stations that belong to the councils "vehicle testing centre scheme".
- e. Introduce the requirement to book the MOT test direct with the testing station.

As option 1 above, however the MOT test must be carried out by VOSA authorised testing stations which are members of the councils "vehicle testing centre scheme". In order for a testing centre to become a member of this scheme they must be able to demonstrate, agree to, or meet the requirements listed below.

Proposed Vehicle Testing Centre Scheme Requirements

- a. The testing centre and the technicians conducting the tests must be VOSA authorised.
- b. When conducting an MOT test the test centre must be able to carry out some additional safety checks (these are to be confirmed following the consultation and will be no more than are required at present). These items must be documented by the test centre and evidence provided to accompany the MOT certificate.
- c. Where a vehicle fails on major faults the test centre must notify the council immediately so that a decision can be made in relation to suspending the licence plate.
- d. They must have in place a documented customer service policy detailing their complaints procedure and complaints handling process.
- e. Records must be kept of customer complaints received. To include the outcome of the investigation in to the complaint.
- f. They must offer competitive prices and ensure value for money.
- g. They must be able to communicate with the council via email and telephone.
- h. Any enquiry from the council must be responded to within a reasonable timescale according to the nature and urgency of the enquiry, with a

- maximum response time of 2 working days.
- i. Statistical information and vehicle data should be made available on request and on a monthly basis.
 - j. Monthly statistics and data should be in spreadsheet form (ms excel or compatible) and in the agreed format.
 - k. Data must be provided via email.

It should also be noted that Peterborough City Council:

- a. Will not be entering in to a contract with any MOT test station that is a member of the councils "testing centre scheme".
- b. Is not by way of entering any MOT testing station on its "testing centre scheme" guaranteeing, endorsing or promoting the quality of work or the integrity of that MOT test station.
- c. Will not accept responsibility for handling any test related issues or complaints arising from any tests or re-tests undertaken by the MOT test station, such disputes remain between the customer and the MOT test station. However we will monitor complaints to ensure that they have been dealt with according to the individual policies provided by the testing centres and that the driver has been treated accordingly.
- d. Will not be involved / responsible for the booking of vehicle tests.
- e. Will not be responsible for any payments to any test centre for testing, and likewise will not be responsible for any refunds in relation to testing.
- f. Will reserve the right to remove an MOT testing station for the scheme where it is deemed appropriate to do so.

Advantages

1. Will simplify current arrangements and partially reduce the administrative burden on both the driver and the council.
2. Will help to reduce the number of routine interactions between the driver and the council and hence help reduce any inconvenience or loss of income by avoidable contact with the council.
3. Will contribute to a more cost effective service freeing up resources enabling issues to be dealt with in a more timely fashion.
4. Encourage competition and therefore generate a more competitive pricing structure and market place.
5. Will provide flexibility for drivers offering an increased availability of test appointments.
6. The council will still have access to analytical data in regards to MOT failures in order to identify where specific vehicles fail tests frequently.
7. Additional vehicle test requirements that are currently subject to testing under the councils MOT exemption test regime will continue to be tested and monitored.

Disadvantages

1. There may be a perception that where testing is available through the open market that audit trails on continuity may be affected.

Option 3:

Retain the current requirement to have an MOT exemption test carried out by either

of the councils 2 testing stations.

- a. Retain the requirement for a vehicle to have an MOT exemption test.
- b. Retain the requirement to book a test via the licensing department.
- c. Retain the requirement for a vehicle to be tested at the Unity or Enterprise testing stations.

Advantages

1. The council will continue to have access to analytical data in regards to MOT failures in order to identify where specific vehicles fail tests frequently.
2. Additional vehicle test requirements that are currently subject to testing under the councils MOT exemption test regime will remain in place. They include the certification of the fire extinguisher, first aid kit, fare card, and the safety testing of the wheelchair ramp where appropriate.

Disadvantages

1. The administrative burden on both the driver and the council will continue.
2. The number of routine interactions between the driver and the council will continue and hence the benefits of the reduction of any avoidable any interactions will not be achieved.
3. Will not contribute to a more cost effective service freeing up resources enabling issues to be dealt with in a more timely fashion.
4. Will not encourage competition and therefore will not generate a more competitive pricing structure and market place.
5. The flexibility for vehicle test appointments will remain limited with the current testing regime.

4. Regulatory Impact Assessment

Cost

The overall level of fees and costs will depend on which option, or combination of options, maybe chosen to replace the present arrangements. Whatever the outcome Peterborough City Council is committed to ensuring the costs are proportionate and offer good value.

Proposed Fees

The table below indicates the proposed fees payable to the council depending on the outcome of the consultation and any amendments to the Taxi and Private Hire Licensing Policy. Where the fee excludes the cost of the vehicle test the driver will be responsible for this cost and will pay the testing centre direct.

| | Current Fee | Option 1 | Option 2 | Option 3 |
|---|---------------------|---------------------|---------------------|---------------------|
| Hackney Carriage Licence Fee | £210 including test | £160 excluding test | £160 excluding test | £210 including test |
| Private Hire Vehicle Licence Fee | £180 including test | £130 excluding test | £130 excluding test | £180 including test |
| 6 Monthly Test (where applicable) | £65 including test | £10* excluding test | £10* excluding test | £65 including test |
| * Where 6 monthly test certificates are not supplied to the council by the required | | | | |

date and subsequently it becomes necessary for officers to investigate there will be an additional charge of £5

YOUR COMMENTS AND MAKING A SUBMISSION

Your comments

We hope you will take time to consider the options mentioned and respond to us with your comments on how you would like to see the Hackney Carriage and Private Hire Vehicle Licensing requirements taken forward in the future.

We want to hear from you, and in particular your thoughts on the following aspects of the proposals would be very welcome.

- The principles and considerations underpinning the each option.
- Any advantages or disadvantages to be considered.
- The practical implications of any of the options.

We would also welcome any other options that appear to you to provide a workable alternative to the current arrangements.

How to respond

If you wish to make representations concerning any of the proposals contained within this consultation document please ensure that your comments arrive on or before **Thursday 25 April 2013** (Please quote reference number lpc01/2013 in your correspondence).

You can respond via email to lpc@peterborough.gov.uk or alternatively you can respond in writing to the following address:

Licensing Consultation Officer
The Licensing Team
4th Floor
Bayard Place
Broadway
Peterborough
PE1 1HZ

If you are responding as a representative of an organisation, please include in your response some background information about the people or organisation you represent.

This consultation is being sent to the organisations and individuals previously listed in this document. If you think any other organisation or person should see it please let us know.

Please note that all representations received may be considered in public by the Council and that the substance of any representations together with the name and address of the person making it could become available for public inspection.

Next steps

Any amendments to the policy will be introduced following full consideration of the responses received and the approval of the Licensing Committee. Until further notice all existing policies and conditions remain unchanged.

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