



**Lewes District Council
Dual Driver Licensing Taxi Consultation**

April 2 2020

On behalf of the GMB Brighton & Hove Taxi Section and Unite the Union South East (Cab Section) we are responding to the Lewes District Dual Driver Licensing Taxi Consultation and refer to the questions in the online survey.

It is considered that having had the vast majority of the Lewes private hire and hackney carriage fleet predominantly working in Brighton and Hove that this qualifies for our views to be made known to and what's more, considered by – Lewes District Council.

Q2: Do you think that Lewes District Council should issue Dual Driver Licences rather than Hackney Carriage and Private Hire Licences?

This is very dependent on what conditions would be attached to such a dual driver licence, as both 'conditions of licence' and pre-conditions for the eligibility for the grant of a licence.

Q3: Do you think that new dual drivers should be required to undertake the higher taxi standard knowledge test?

Unless it is the intention of the council to lower the standards required of a professional section of the transport industry then where a new 'Dual Licence' may be issued it should certainly be a requirement to undertake the higher standard knowledge test.

Q4: Do you think that existing Private Hire Drivers should undertake a new knowledge test if they wish to change their existing private hire/hackney carriage to a dual licence?

Unless it is the intention of the council to lower the standards required of a professional section of the transport industry then all existing private hire driver should certainly be required to undertake the higher standard knowledge test.

Q5: Do you think that existing Hackney Carriage Drivers should be able to apply for a new dual drivers licence without an additional test as they have already completed the higher standard knowledge test?

It would not be appropriate to expect existing Hackney Carriage Drivers who have already achieved the higher standard knowledge test to have to undertake and presumably pay for another knowledge test that has already previously been attained for the purpose of being granted a dual driver licence

Additional Comments

The Lewes District taxi licensing department has been inundated with a mass of private hire vehicle and private hire driver licence applications over the last 18 months and in September 2019 was listed by the Department for Transport (DfT) as having had an unprecedented increase of 91.6% for licensing vehicles which of course have to be driven by newly licensed PH drivers.

Table 3: The licensing authorities showing the largest percentage increases and decreases in licensed vehicles between 2018 and 2019, England (TAXI0104)

Local Authority	% increase	Local Authority	% decrease
Lewes	91.6	Rossendale	49.9
Aylesbury Vale	64.3	St Albans	37.5
Wolverhampton	62.3	Telford and Wrekin	33.9
South Gloucestershire	54.5	South Oxfordshire	23.6
Broadland	45.0	Hertsmere	21.7

Local level changes

Large year on year changes can occur in a licensing authority for a number of reasons, such as a large operator moving in or out of a given licensing area, or significant changes in local licensing policy

The number of total licensed vehicles increased in just under half of the licensing authorities in England (142 out of 293 licensing authorities).

We would consider that the council has looked at the impact of this massive increase and considered that by raising standards for the knowledge test for newly issued private hire driver licenses to obtain the same standards (as existing hackney carriage drivers have to undertake) for a combined 'Dual Licence' may help to address the situation.

However the council should not upgrade any existing private hire licence to a dual licence without a requirement to pass the higher standard knowledge test, as this would in effect be an affront to those hackney carriage drivers who went out of their way to achieve the required standards and in turn, would only lower the standard of licensing across the trade.

Brighton & Hove adopted the system of the 'Dual Licence' a few years ago. However the knowledge test for private hire drivers has always been the same as it is for a hackney carriage driver licence which is a very extensive test and maintains a high standard of licensing throughout the entire trade.

Andrew Peters
Secretary
GMB Brighton & Hove Taxi Section

Sean Ridley
Secretary
Unite the Union – South East (Cab Section)