

Dear Automated Vehicles Team,

I am writing to share the Local Government Association's (LGA) feedback on the 'Automated Vehicle: Passenger Services and Public Transport' consultation.

Following a review of the regulation of the taxi and private hire vehicle sector, the Law Commission published a report and draft Bill in May 2014 which was never taken forward by government. Whilst the sector has undergone rapid change since the report was published and continues to do so, the Law Commission should use this latest review as an opportunity to urge government to bring forward a Taxi Reform Bill which looks both at what is needed now and in the future.

As markets change and develop, so too regulation and regulators must adapt and it is vital that any new legislation has the flexibility to keep up with the pace of change. However, the immediate priority must be to respond to the challenges local authorities are facing now. The taxi and private hire vehicles (PHV) market has changed beyond recognition since the existing framework was introduced and will continue to evolve. The LGA urges the new government to take the much needed step of modernising outdated taxi and PHV legislation and introduce a Reform Bill to ensure we have a regulatory framework that is fit for purpose and protects the travelling public.

A particular issue for many local areas and licensing authorities has been the growth in out of area working over recent years. There needs to be national minimum standards introduced for taxis and PHVs to align licensing and safety standards across the country, while retaining local flexibility for councils. Councils also need national enforcement powers so they can take action against any vehicles operating in their areas irrespective of where they are licensed. Further work also needs to be done to address the limited oversight of drivers of public service vehicles (PSV).

The LGA has long advocated comprehensive reform of the process for creating and enforcing traffic regulation orders (TROs). The current requirement for the publication of TROs, the consultation requirements and the bureaucracy involved in inquiries constrains the ability of highway authorities to manage traffic on their network. The legislation has failed to keep pace with changes to the way the media industry is structured and the capacity of modern technology to keep the public informed.

We believe a reform of the legislative requirements in particular the publication requirements could deliver a system that better consults interested parties in a way that is more accessible at a lower cost.

Councils take a wide variety of considerations into account when setting parking charges in line with our statutory requirements. It is worth noting that any new legislation or amendments to local authority parking legislation would have a differential impact for different areas of the country. All areas of the country have a different parking market with differing levels of public and private provision of parking. The public and private parking market operate under different legislative frameworks. Private and public operators exist for different purposes and where the balance of a local market is in favour of private operation the influence of council decisions on pricing are lesser. The LGA believes that public operators already work in a much more constrictive regulatory framework and whilst we would welcome greater freedoms to consider wider factors in setting charges it is worth examining the extent to which this lever would be effective in different places.

Please let me know if you require any further information from us.

Best wishes,

Rebecca

Rebecca Johnson
Adviser (Regulation)



18 Smith Square, Westminster, London, SW1P 3HZ



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