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Jacqui Kennedy OBE
Director of Regulation and Enforcement
Birmingham City Council
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30th March 2015

Dear Ms Kennedy,

I am writing to you following our meeting on 18th March at the Council House, Victoria Square.

I am writing once again on behalf of the Birmingham and Solihull Taxi Alliance and the Birmingham drivers and operators they represent.

There is a formal objection by those drivers and operators to the proposed increase in fees which was advertised by Birmingham City Council on 5th March 2014, as it is required to by the Local Government (Miscellaneous Provisions) Act 1976.

At the meeting on 18th March we were told that this increase was due to costs associated with running the licensing department, not previously being identified and charged by BCC, in respect of support services such as human resources. It was also flagged up that there may be extra costs associated with moving licensing headquarters.

Those who instruct me currently have no means to challenge the assertion in relation in costs, but assuming it is correct, it is felt that it is wholly unfair and disproportionate that the entirety of this increase has to be absorbed by the drivers and operators, especially given a licensing surplus of £400,000 that currently subsists. It is also right to say that the move to Woodcock Street hasn't been effectuated yet and should therefore not enter into any equation. Further, it is felt that enforcement should be self-financing, which doesn't appear to currently be the case. Moreover, it is expected that the move towards online applications would also provide an area of saving going forward.

At our meeting you expressed a desire to engage with the trade in a more constructive fashion. If this remains the case we would ask that you defer any decision until proper and full consultation with the trade and its representatives is carried out, in order that the trade can be fully consulted about this proposed increase, as is entirely proper.

I know from speaking to those in the trade there are a number of matters they would like to discuss in relation to the fees, other than this proposed increase. This includes a greater discount for drivers and operators who renew their licence for three years, given the lower administration charge involved and, further, a greater discount for medium size operators who currently pay the same fees as the biggest operators in the city.

Yours sincerely,



Duncan Craig
Barrister