Consultation response: DVA public consultation on changing the cost of driving tests and vehicle tests

27 July 2023

Summary

Given Logistics UK's democratic structure, the policy positions adopted by Logistics UK in Northern Ireland are determined by the members of the Northern Ireland Freight Council.

Logistic UK members' views:

- Members can understand the rationale for a review of driving test and vehicle test fees after such a prolonged period, and expressed support for a regular review process but there was strong opposition to the scale and variation of the above inflation price increases being proposed without what members felt was sufficient accompanying clarity on how these significant increases have been calculated, justified and what they will deliver for the customer.

- Members said greater transparency in terms of the calculation and rational for the proposed fee increases, details of what efficiency actions have been taken and are planned, and an explanation of the benefits to be derived in terms of improved service delivery would better help them understand why these proposed fee increases are needed and assist in their consideration of these recommendations.

About Logistics UK

Logistics UK is one of the country's largest business groups, supporting, shaping and standing up for safe and efficient logistics. We are the only organisation representing the entire logistics sector.

We represent a sector delivering an increasingly innovative, productive and sustainable system of essential national infrastructure. This system ensures the availability of the products that households, businesses and public services rely on every day, and is supporting the UK's transformation for the future. Our membership of over 20,000 includes global, national and regional businesses and SMEs spanning the road, rail, sea and air industries as well as the buyers of freight services, such as retailers and manufacturers.

Consultation response

Q1. Fees have not increased for over a decade. Do you think these fee increases are a fair way to ensure current service levels are maintained? If not, what alternative suggestions do you have as to how the costs of providing our services can be recovered?

While members can understand the rationale for a review of driving test and vehicle test fees after such a prolonged period, there was strong opposition to the scale and variation of the above inflation price increases being proposed (please see Table 1 below for illustration) without sufficient accompanying clarity on how these significant increases have been calculated, are justified and what they will deliver for the customer.

Members also felt it would be beneficial if DVA set out what efficiency and cost saving measures it had implemented and has planned, to enable a fuller consideration of these proposals by customers. Members asked the following questions: Is there an update on a move to biennial testing for cars? In light of DVA's robust roadside checks and the stringent measures for periodical checks and break tests on HGV Vehicles, is any consideration being given to biennial

MOT testing of HGVs which would not compromise road safety but help drive down costs? What consideration is DVA giving to ATF lanes as they operate in GB to help reduce waiting times?

Members felt that any fee increase in the current economic climate would add to the annual recurring costs for businesses, costs which given tight profit margins, will have to passed on to the customer further adding to inflationary pressures. One member stated: *"This increase will cost our company in the region of £20,000 extra per year which will have to be passed onto the end customer and continue to drive up inflation".*

Members expressed concern that any increase in practical driving tests could potentially deter new drivers from taking the test contributing to the shortfall of drivers in the logistics industry.

Several members also stated that their support for any fee increase was hindered at this time by their difficulty in trying to attain vehicle tests. One member suggested that to ensure value for money for the customer and demonstrate that a satisfactory level of service is being provided, DVA could firstly address the backlog of test dates and complete an audit of the throughput of the testing stations to identify where efficiencies could be implemented, with the consideration of a staged fee increase immediately thereafter if deemed necessary.

Table 1

	Practical driving test	**Current**	**Proposed**	**Approx % Increase**
	Car	£45.50	£65.00	42.86%
	Car and Trailer	£66.00	£87.00	31.82%
	Lorry and Bus (driving ability)	£66.00	£87.00	31.82%
	Vehicle test fees	**Current**	**Proposed**	**Approx % Increase**
	Mini bus – large passenger carrying vehicle	£41.50	£70.50	69.88%
	Light Goods Vehicle	£30.50	£38.00	24.59%
	HGV 2 axle	£76.00	£101.00	32.89%
	HGV 3 axle	£87.00	£109.00	25.29%
	HGV 4 axle	£98.50	£117.50	19.29%
	HGV Articulated 2 axle	£80.50	£101.00	25.47%
	HGV Articulated 3 axle	£93.50	£109.00	16.58%
	HGV Trailer 3 axle	£52.00	£86.50	66.35%

Q2. Do you support the development and modernisation of driving and vehicle testing services for a better experience for the customer?

Logistics UK members support the development and modernisation of driving and vehicle testing services for a better experience for the customer but made it clear that the cost vs benefits would need to be demonstrated. Members welcome the increasing online service functionality of the system but felt it would be helpful to understand what *"the development and modernisation of driving and vehicle testing services for a better experience for the customer"* means in practice for customers. Members also called for a review of the effectiveness of the DCPC process to be included in DVA's action plan to develop and modernise services.

Q3. Do you agree that we should provide for a regular review of the cost of delivering these services and any associated fee increases should be applied on a regular / annual / biennial (every other year) basis?

Members supported a more regular cost review. Preferences were evenly split between an annual and biennial review but there was majority support for a review which included, for transparency purposes, a published review of the operating costs of running services. Members also stated that any associated fee change should be kept to a minimum and based on inflation.

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Logistics UK