

Regulatory Triage Assessment

Title of regulatory proposal	Illegal working in relation to private hire vehicles etc.
Lead Department/Agency	Home Office
Expected date of implementation	October 2016
Origin	Domestic
Date	24/11/2015
Lead Departmental Contact	Sam Murray
Departmental Triage Assessment	Low-cost regulation (fast track)

Rationale for intervention and intended effects

The majority of drivers of taxis and private hire vehicles (PHV) are self-employed and therefore not subject to existing right to work checks undertaken by employers. This leaves scope for this sector to be exploited by those who intend to work illegally. Most licensing authorities undertake checks to determine whether someone is 'fit and proper' to hold a driver or operator licence, however, they have discretion as to how many of the checks they undertake to satisfy themselves that someone passes this fit and proper test. Many licensing authorities make immigration checks but these are not compulsory at present.

As part of its consultation, the Home Office conducted a survey of the taxi and PHV licensing authorities seeking their views on the licensing system. Sixty-three per cent of local authorities report abuse of the licensing system for example, document fraud, and there is a tendency in licensing for taxis and PHVs drivers to apply to one licensing authority but to work in another area, to avoid authorities with more stringent checks (for example, Rossendale has experienced a 311 per cent increase in taxi/PHV driver licences issued in the period 2013-15). All licensing authorities should undertake consistent and effective immigration status checks across the UK. The licensing authorities support this policy change. The intention of the provisions in the Immigration Bill is therefore to make immigration checks mandatory and to embed immigration safeguards into the existing licensing regimes.

These measures are consistent with others in the Bill to prevent illegal migrants from retaining a UK driving licence, introducing a criminal offence of driving whilst illegally present in the UK and new powers to seize the vehicles of illegal migrants.

Viable policy options (including alternatives to regulation)

The do nothing option does not amend the relevant legislation for taxis and PHVs and would not mandate immigration checks as part of the existing licensing regimes. There are no additional costs associated with this option but it does not meet the policy objective. It is not the Government's preferred option.

Specifically, the new provisions amend the licensing regimes for taxis and private hire vehicles in England and Wales (the Metropolitan Public Carriage Act 1869, the Local Government (Miscellaneous provisions) Act 1976 and the Private Hire Vehicles (London) Act 1998, and contain a regulation making power to amend legislation in Scotland and Northern Ireland to have the equivalent effect. Costs here relate to England and Wales only.

The policy option under consideration is to include provisions so that driver and operator licences must not be issued to persons who do not have immigration leave

and permission to work. Licensing authorities must undertake immigration status checks as part of the licence application process. Where immigration leave is time-limited to less than the statutory length for a driver or operator licence, the licence will be issued for a duration which does not exceed the applicant's period of leave. Licensing authorities will be issued with guidance by the Secretary of State on how to conduct checks on someone's immigration status.

The new provisions add immigration offences and penalties to the list of grounds on which driver and operator licences can be revoked. These offences and penalties are set out in the Immigration Bill and include offences under previous immigration acts and penalties for illegal working and renting property to illegal migrants. Where a licence holder's leave comes to an end (for example, through curtailment) their licence automatically lapses. It is compulsory to return lapsed driver and operator licences. Failure to return documents is an offence and the Immigration Bill specifically reinforces this.

Non-regulatory options are not considered to be effective. Currently immigration status checks are advisory and accordingly licensing authorities have discretion as to whether or not to conduct them.

Initial assessment of business impact

There are 297,000 taxi/PHV driver and 14,800 operator licences in England at 31 March 2015. London accounts for 35 per cent of all taxi/PHV driver licences and 20 per cent of all operator licences. A survey of licensing authorities had a response rate of 30 per cent but when weighted by licence volume, the response rate was 62 per cent. Ninety-seven per cent of the licensing authority respondents carry out face-to-document checks in order to prevent abuse of the licensing system. Formalising this requirement for all licensing authorities is unlikely to be a significant impact on business or licensing authorities.

The estimated costs to business of this policy lie in a range of £0.1 million (PV) to £1.7 million (PV) over 10 years with a central estimate of £0.5 million (PV). There will be familiarisation costs, ongoing staff costs, admin costs and perhaps travel costs where an appointment is required. There are no quantifiable benefits to this policy.

The Net Present Value (NPV) of this policy is estimated to be -£0.5 million and this is also the Business NPV (BNPV). The Estimated Annual Cost to Business (EANCB) is £0.06 million.

Business Impact Target status

This proposal is expected to be a qualifying regulatory provision under the Small Business, Enterprise and Employment Act 2015, and therefore in scope of the Business Impact Target. The best estimate of the EANCB is £0.06 million (2014 prices). Even in the high scenario the EANCB estimate is only £0.20 million.

Rationale for Triage rating

This is a low-cost regulation and suitable for fast track because the gross costs to business do not exceed £1 million in any year, even in the high estimate.

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Supporting evidence

1. The policy issue and rationale for Government intervention

Illegal working is a key driver of illegal migration. As most drivers are self-employed, they are not subject to existing right to work checks undertaken by employers. Whilst many licensing authorities currently have regard to someone's immigration status as part of the application process, not all do. This leaves scope for the taxi and private hire vehicle (PHV) licensing sector to be exploited by those who intend to work illegally.

Furthermore, drivers may operate in areas outside the one that granted them a licence¹, where checks may be less stringent. It is therefore sensible and proportionate to require all licensing authorities to undertake simple immigration status checks, and for licences not to run for longer than the holder has permission to be in the UK and work. Immigration offences and penalties should be grounds for a licence to be revoked. Furthermore, where someone is disqualified from holding a licence they are required to return it to the licensing authority within a specified period of time in order that the invalid licence is not used to obtain employment.

Licensing authorities in England and Wales, the Local Government Association (LGA), the Institute of Licensing (IoL) and Transport for London (TfL) have been consulted on the development of this proposal. A survey of licensing authorities was conducted during October/November 2015 and so far, 94 of 315 authorities have responded, a response rate of 30 per cent. When weighted by the volume of licences, these authorities account for 62 per cent of all licences. Sixty-three per cent (weighted response) of respondents report evidence of abuse of the licensing regime in the last year (in response to the question '*What evidence of abuse has your licensing authority seen in relation to taxi/PHV licensing?*'). The three most commonly cited evidence based concerns are:

- a) Document fraud, which includes passports and identity documents, forged National Insurance Numbers, fraudulent MOTs and forged or altered certificates from overseas.
- b) The abuse of the Tier 1 Entrepreneur route, by undertaking low-paid self-employment and acting against the intention of the route.
- c) Individuals abusing the extension process (submitting in time appeals after their application to extend their leave has been refused) to simply prolong their working time in the UK by up to nine months.

All are significant areas of concern. Impersonation and a small amount of criminal activity are also reported by licensing authorities. Licensing authorities need to determine that someone is 'fit and proper' to hold a licence and they have discretion as to the checks they undertake. Typically these will include checks on the applicant's criminal record, medical fitness and driving record. They may check immigration status – but this is not mandatory. Immigration Enforcement (IE) also report illegal working in this sector.

It may be thought that London might have dominated the results of the survey, as they account for 35 per cent of driver licences and 20 per cent of operator licences. However, when the survey results for England and England excluding London are compared, there is only a relatively small difference between them (perhaps a few percentage points or within a 1-2 per cent difference) therefore there is no evidence of any significant difference in the characteristics of licensing authorities across the UK. The Home Office will use the consultation to find out more about the economic impacts of licensing requirements for taxis and PHVs.

¹ See the decision in: *The Queen (on the application of Newcastle City Council) claimant- and - (1) Berwick-upon-Tweed Borough Council*, in the High Court of Justice, Queen's Bench Division, Administrative Court, 2008, EWHC 2369 (Admin), <http://www.national-taxi-association.co.uk/wp-content/uploads/2011/01/Newcastle-CC-vs.-Berwick-Upon-Tweed-BC-and-others.pdf>

2. Policy objectives and intended effects

The Government's primary objective is to make it more difficult for people who are unlawfully in the UK and/or do not have the right to work to obtain and continue to hold private hire vehicle and taxi driver and operator licences. The intended effect is to encourage more people who are illegally resident to choose to leave the country and to reduce the numbers who overstay.

3. Policy options considered, including alternatives to regulation

Do nothing

This does not amend the relevant taxi and PHV licensing legislation and immigration checks would not be a mandatory part of the existing licence application processes. There are no significant costs associated with this option but as it does not meet the policy objective, it is not the Government's preferred option.

Preferred Option

The Government's preferred option is to make an immigration status and right to work check a mandatory component of the licence application process for a taxi/PHV drivers and operators.

Alternative Options

Alternative options for the additional immigration status check were considered, including self-certification or a declaration of status. At the consultation meetings with TfL, the LGA and the IoL, the licensing authorities' representatives unanimously rejected any form of non-regulatory option. Due to the significant potential for abuse in the system there was widespread concern that moving away from a regulatory system would help to facilitate further incidents of abuse. Licensing authority officers were very concerned that they had a duty to protect the public, promote awareness and best practice and did not believe that a non-regulatory system would help to achieve those objectives nor would it help to prevent those who do not have lawful status to be in and work in the UK, to be operators or drivers of taxis and PHVs. The existing legislation and system is also based on a regulatory approach therefore introducing a non-regulatory aspect to the system was thought to be counter productive and could take a great deal of energy, resources and education to achieve the required goal – a disproportionate response to the problem. Furthermore, immigration status checks are not mandatory at present. The only way to achieve the policy objective of not issuing licences to those without lawful status and permission to work, is by requiring all licensing authorities to undertake checks and this can only be achieved through regulation.

4. Expected level of business impact

Costs to business in scope of the EANCB are the familiarisation costs of private sector staff (taxi/PHV operators and drivers), ongoing costs of providing additional information when applying for a licence, additional photocopying and in cases where private sector operators and drivers have to turn up for a face-to-document check, whereas previously they did not, there will be travel costs. Costs arising from revoking licences and/or returning revoked licences and from penalties are not included here as they are costs to non-compliant operators/drivers, and so do not count in the EANCB. Under current taxi and PHV licensing legislation drivers have to return revoked licences.

In many licensing authorities there will not be any additional costs to business because these authorities already require all of these standards to be met, for example Leeds City

Council and TfL. The survey of licensing authorities shows that 81 per cent (weighted by volume of licences) of respondents thought that there would be no additional costs and 97 per cent (weighted by volume of licences) of respondents indicate that face-to-document checks already take place during a licence application.

Section 10 of the Deregulation Act 2015, which came into effect on 1 October 2015, set a standard length for all taxi and PHV driver licences at three years and PHV operator licences at five years. Licences can only be issued for shorter durations where the licensing authority thinks it is appropriate in the particular circumstances of the case. Such circumstances could include where the licensing authority considers that a probationary period is necessary; or where the driver's leave to remain in the UK is time-limited. In the event that a licence is issued for a period of less than three years for drivers or five year for operators, it would be appropriate for the licence fee to be charged on a pro-rata basis.

General Assumptions

Information on licences was obtained from Department of Transport Taxi and Private Hire vehicle Statistics for 31 March 2015². There are 297,000 taxi/PHV driver and 14,800 operator licences in England at 31 March 2015. London accounts for 35 per cent of all taxi/PHV driver licences and 20 per cent of all operator licences. Data was extracted on the following categories of licences for England & Wales and London:

- Private Hire Vehicles Operators (London).
- Private Hire Vehicles Operators (England & Wales excluding London).
- Taxi Operators (England & Wales excluding London).
- Private Hire Vehicle Drivers (London).
- Private Hire Vehicle Drivers (England & Wales excluding London).
- Dual (Taxi/PHV Licence) Drivers (London).
- Dual (Taxi/PHV Licence) Drivers (England & Wales excluding London).

In order to estimate future volumes of applications, growth rates were estimated based on past trends (from 2007 to 2015 inclusive). The central scenario uses average growth for each licence type: the low scenario uses the minimum annual growth rate in the period, and the high scenario uses double the central growth rate (this is likely to be an overestimate, as taxi driver reported volumes over 2007-15 have declined by 1.2% in England and Wales and by 2% when London is excluded. PHV operator licences have fallen by 1.8% in England and Wales in 2015 compared to 2013).

Estimates are for the total number of licences issued. In order to estimate the number of new checks each year from new application or renewals, the stock of licences is divided by the average duration of licences to estimate the flow of licence applications. As drivers renew their licence every three years, the stock of licences as at 31 March 2015 is divided by three and it is assumed that this volume of applications occurs every year. Similarly, operators renew their licence every five years and the stock of operator licences is divided by five to give an estimate of the annual volume of applications.

² Department of Transport Taxi and Private Hire vehicle Statistics for 31 March 2015 and Table TAXI0104, see <https://www.gov.uk/government/statistics/taxi-and-private-hire-vehicles-statistics-england-2015>

Wages are taken from the Annual Survey of Hours and Earnings (ASHE) for 2014 published by the Office for National Statistics³. Gross median hourly wages are used in the estimate and these are grossed up using an uplift of 19.8 per cent for non-wage costs as recommended by HMRC and Department for Business Innovation and Skills. The wage used for taxi/PHV operators is £11.34, for drivers £7.50 and when these are grossed up the figures are £13.59 and £8.99 respectively.

Information gained from the consultation, and responses from the survey of licensing authorities (discussed above) were used to estimate the additional costs that accrue to drivers and operators as a result of these proposals. The survey indicated that the majority of respondents already conduct some form of document check - 97 per cent (weighted by licence volume) of licensing authorities conduct face-to-document checks in the premises, and that a high proportion already include some form of check of nationality.

When asked whether the checks proposed would result in additional costs, many licensing authorities expect there to be no additional costs. In the answer to the question, *'How many minutes might it take for an applicant to provide any additional information?'* 39 per cent {unweighted} or 81 per cent {weighted by licence volume} of the 64 respondents to the question did not expect there to be any additional time taken by applicants as they are already required to do this.

When estimating **ongoing costs of additional checks**; in the central case the assumption is that 19 per cent of licence applications will incur additional costs (using the estimate weighted by volume of applications, as this is applied to the estimate of applications). For a low estimate, it is assumed that survey non-respondents are half as likely to incur additional costs, and in the high we assume that non-respondents are twice as likely to incur costs, which leads to estimates of 15 per cent affected in the low, 19 per cent in the central and 26 per cent in the high scenario. For all ongoing costs in the first year only, 50 per cent of the costs apply as the policy will not be implemented until October 2016.

For **photocopying costs** we assume that photocopying needs will be similar to those required during an ongoing check, and therefore in the central case we assume that 19 per cent of all licence applications will require additional photocopying. Using the assumption above, we assume that non-respondents are half as likely to need additional photocopying, and in the high scenario non respondents are twice as likely, leading to a range of 15 to 26 per cent of applications needing additional photocopying.

For **travel costs** the estimates use the survey response of 3 per cent of applications not involving a face-to-document check in the central scenario. As above we assume that non-respondents are half as likely to face checks in the low, and twice as likely to face checks in the high, leading to a range of 1.5 to 6 per cent.

This policy has some small public sector costs, not set out in detail in this RTA. At a disaggregated level this is why there are minor differences between total cost and business cost and between Net Present Value and Business Net Present Value.

³ Office for National Statistics (2014) Annual Survey of Hours and Earnings, November, Table 14.5a, London see <http://www.ons.gov.uk/ons/rel/ashe/annual-survey-of-hours-and-earnings/2014-provisional-results/stb-ashe-statistical-bulletin-2014.html>

Familiarisation Costs

Familiarisation applies to individual applicants (drivers and operators) across the 10 year period. It has been assumed that 100 per cent of applicants read the guidance in the first licensing phase (years 1-3 for drivers and years 1-5 for operators). In subsequent periods, applicants will be made up of renewals (for whom no new familiarisation is needed), and new applications. The familiarisation costs assume that for each subsequent licensing phase, the volume undertaking familiarisation decreases by 50 per cent. In the years 4-6 for drivers and 6-10 for operators, 50 per cent of applicants incur familiarisation costs. For the years 7-9 for drivers 25 per cent of applicants are assumed to have familiarisation costs and in year 10 only 12.5 per cent of drivers incur familiarisation costs. This is a simplifying assumption, in the absence of specific information on new and renewal licence applications.

The assumption for reading the guidance notes on the form (about 200 words) for the additional question is taken to be 30 seconds, two and four minutes for the low, central and high scenarios. The reading times were estimated using standard tables from [readingsoft.com](http://www.readingsoft.com)⁴ (columns 2 and 3). Because of lower comprehension a slow reader may need to re-read the guidance (column 4). An allowance has been made for people who may be dyslexic or where English is not their first language.

Scenario	Speed wpm	Comp	Re-read	Allowance	Total time
High	(slow) 100	50%	1.0	1.0	4.0
Central	(average) 200	60%	0.4	0.5	2.0
Low	(good) 400	80%	0.0	0.0	0.5

Notes: wpm = words per minute. Comp = comprehension. Units are minutes unless otherwise specified.

Consultation with the licensing authorities, the Local Government Association (LGA) and the Institute of Licensing (IoL) confirms that for applicants it may take 30 seconds, two minutes or four minutes (for a low, central and high scenario) to familiarise themselves with any updated guidance associated with additional information requested. Most licensing authorities thought that because many licensing authorities actually have in place these requirements that the time taken to familiarise private sector applicants would be close to zero. The estimates below assume that familiarisation is likely to apply to all applicants (even where licensing authorities have indicated they do not expect additional familiarisation). This is a prudent assumption so that there is no underestimate of the familiarisation costs. The familiarisation cost is estimated as:

the volume of licences x the wage x time taken to familiarise

- The 2015 stock volume of operators is taken as 15,500 for England and Wales and for drivers it is 308,000. Minimum, average and high growth rates are applied to these volumes going forward to 2024/25.
- The gross wage for drivers is £8.99 and for operators it is £13.59.
- The time taken to familiarise is assumed to be 30 seconds, two minutes and four minutes for the low, central and high scenarios.

The familiarisation cost to the private sector is estimated as:

the volume of licences x the wage x time taken to provide the additional information

This results in estimated familiarisation costs of (£, (PV) over 10 years):

⁴ Readingsoft is a website that provides information on reading speeds and comprehension see <http://www.readingsoft.com/>

Group	Low	Central	High
Operators	£1,900	£9,600	£20,100
Drivers	£32,200	£155,300	£365,800
Total	£34,200	£164,900	£385,900

Ongoing Costs

Responses from the survey indicate that for applicants it may take one minute, seven minutes or fifteen/sixteen minutes (operators/drivers) and (for a low, central and high scenario) to provide the additional information for an immigration status check (including time taken to provide documentary evidence to demonstrate a right to be in the UK and to work). Consultation with the licensing authorities, the LGA and the IoL confirm these timings are relatively robust estimates. Applying the proportion of licence applications (which includes renewals), as described in '*General Assumptions*', the central estimate assumes 19 per cent of applications are estimated to incur additional ongoing costs, with a range of 15 to 26 per cent. To determine the volume of applications affected, ongoing costs are estimated as:

the volume of licences x the wage x time taken to provide the additional information

Assuming wage levels as stated above, estimated ongoing private sector staff costs could be (£, (PV) over 10 years):

Group	Low	Central	High
Operators	£700	£7,900	£24,400
Drivers	£12,700	£178,000	£700,500
Total	£13,400	£185,900	£724,900

Photocopying Costs

Photocopying is assumed to be 2p per copy in-house or 4p per copy from the licensing authority and 8p per copy from an external provider. These figures are used as an illustrative guide to potential copying costs. As previously stated in the '*General Assumptions*' section, the low scenario assumes that these costs apply to 15 per cent of licence applications. The central scenario assumes that these costs apply to 19 per cent of applications (the proportion of licence applications where it is expected that additional ongoing costs will be incurred) and the high scenario assumes that the costs apply to 26 per cent of applications. Using the proportions assumed to incur additional photocopying costs described above, applied to the total volume of driver and operator licences going forward to 2024/25, the photocopying cost is estimated as:

the volume of licences x the copy cost

Estimated photocopying costs could be (£, (PV) over 10 years):

Group	Low	Central	High
Operators	£400	£,900	£2,600
Drivers	£7,500	£19,000	£51,900
Total	£7,900	£19,900	£54,500

Travel Costs

It is possible that making the mandatory immigration check a more effective check that some licensing authorities may decide to require people to attend in person (as many authorities already do) to verify their documentation and conduct a face-to-document

check. For those who may be affected by this an estimate of travel time cost has been included in the assessment. The travel time estimates are taken from the Department of Transport WebTAG publication.⁵ For operators the travel time cost value is £30.80 per hour and for taxi/PHV drivers it is £14.74 per hour. The distance travelled to a local authority centre is proxied by the Department for Transport ‘Travel Time to a Town Centre by Local Authority’ publication⁶. The average travel time to a local authority office in a town centre by car is seven minutes for England and this is used in the low scenario. The average scenario value is taken as 15 minutes, the next time category that most town centres can be reached in by car and 30 minutes is applied for the high scenario. The cost is assumed to apply to 1.5 per cent, 3 per cent and 6 per cent of all licence volumes as described in the ‘*General Assumptions.*’ The travel cost occurs every year. It is estimated as:

the volume of licences x the travel cost x time involved in travelling

Estimated travel costs could be (£, (PV) over 10 years):

Group	Low	Central	High
Operators	£1,100	£6,100	£25,500
Drivers	£17,900	£101,400	£521,600
Total	£19,000	£107,500	£547,100

Total Costs to Business, NPV, BNPV and EANCB

The total cost of the policy is estimated to be in the range £0.1 million (PV) to £1.7 million (PV) over 10 years. There are no quantified benefits to this policy. The NPV is estimated to be -£0.5 million in the central scenario. The BNPV is virtually the same as the NPV at -£0.5 million (PV). The EANCB is estimated to be £0.06 million per year in 2014 prices and at a 2015 present value. Even in the high scenario the EANCB is only £0.2 million. At no time in the profile of the economic costs do gross costs to business exceed £1 million so therefore it is concluded that this policy is suitable for fast track assessment as a low cost measure.

⁵ Department of Transport (2014) WebTAG publication, Table A.1.3.2, 2014 prices on 2010 values for the year 2015.

⁶ Department for Transport (2014) Table ACS0408, Travel time, destination and origin indicators to Town centres by mode of travel, local authority, England, 2013, Accessibility Statistics, see <https://www.gov.uk/government/organisations/department-for-transport/series/transport-accessibility-statistics--3>

Table 1, Summary Table of Data, Assumptions and Estimated Costs (2014 prices)

Description	Low	Central	High	Source
Base volume Operator Licences	15,500	15,500	15,500	2015, growth rates applied to 2024/25
Base volume Driver Licences	308,000	308,000	308,000	2015, growth rates applied to 2024/25
Familiarisation cost	£34,200	£164,900	£385,900	
Operator gross median wage/hour	£13.59	£13.59	£13.59	ASHE 2014, Table 14.5a, per hour
Driver gross median wage/hour	£8.99	£8.99	£8.99	ASHE 2014, Table 14.5a, per hour
Time taken to read (minutes)	0.5	2	4	Taken from survey/consultation meetings
Applies to proportion of licences (1)	100%	100%	100%	All require familiarisation.
Checks Ongoing cost	£13,400	£185,900	£724,900	
Operator gross median wage/hour	£13.59	£13.59	£13.59	ASHE 2014, Table 14.5a, per hour
Driver gross median wage/hour	£8.99	£8.99	£8.99	ASHE 2014, Table 14.5a, per hour
Time taken (minutes)	1	7	15	Survey responses/consultation meetings.
Applies to proportion of licences	15%	19%	26%	Survey of licensing authorities.
Photocopying cost	£7,900	£19,900	£54,500	
Cost per copy	£0.02	£0.04	£0.08	Consultation meetings
Applies to proportion of licences	15%	19%	26%	Survey responses/consultation meetings.
Travel cost	£19,000	£107,500	£547,100	
Operator value of time (hour)	£30.80	£30.80	£30.80	DfT WebTAG 2014 Table A.1.3.2.
Driver value of time (hour)	£14.74	£14.74	£14.74	DfT WebTAG 2014 Table A.1.3.2.
Time taken to travel (minutes)	7	15	30	DfT Accessibility Statistics (2013) T ACS0408
Applies to proportion of licences	1.5%	3.0%	6.0%	Survey of licensing authorities.
Total Cost	£0.1	£0.5	£1.7	PV

(1) Note: Reduces by 50% every 3 years for drivers and every 5 years for operators.

Cost £ million (10 yr PV)	Low	Central	High	
Familiarisation cost	£0.03	£0.16	£0.39	PV
Ongoing cost	£0.01	£0.19	£0.72	PV
Photocopying cost	£0.01	£0.02	£0.05	PV
Travel cost	£0.02	£0.11	£0.55	PV
Total cost	£0.1	£0.5	£1.8	PV
NPV	-£0.1	-£0.5	-£1.8	
BNPV	-£0.1	-£0.5	-£1.7	
EANCB	£0.01	£0.06	£0.20	2014 prices