

**CONSULTATION ON DRAFT NORTH NORTHAMPTONSHIRE
HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICY AND CONDITIONS**

North Northamptonshire Council is reviewing its policies in respect of Hackney Carriage and Private Hire Licensing, as it is currently operating under the four former sovereign council policies and conditions in respective areas of North Northamptonshire.

A draft policy and conditions have been formulated by combining the four sovereign policies and conditions as far as possible, whilst incorporating relevant updated guidance and statutory requirements.

Due to the complex nature of combining and updating four separate policies and licensing conditions, it is not possible to map existing changes from the previous policies to the new draft one. As such, this consultation has been devised to permit the widest possible scope of responses, as we want to implement a new policy and conditions which fairly balances the interests of all parties and stakeholders, whilst maintaining appropriate standards.

Due to the scope of this consultation it has been set up to be managed via electronic media. However, should anyone require paper copies of any documentation, please contact the relevant licensing team for that area using the contact details overleaf.

The consultation is running for 8 weeks from 1st June to 27th July 2022

Responses can only be accepted in writing and must be submitted by 5pm on the closing date above. Late responses will not be accepted. The process for consultation, review and implementation of the amended policies is outlined below:

- Consultation for 8 week period;
- Consultation responses considered, amendments made where appropriate and draft report compiled for Licensing and Audit Committee; Recommendations from Licensing and Audit Committee to Full Council;
- Proposed amendments and draft policies considered by Full Council;.
- Policy ratified by Full Council;
- New policies and conditions of licensing come into force

1	Licensing Policy			
	Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
	1.0.7	Why are you implanting changes from the DFT Best Practice Guide which is has only just finished consultation	This document has caused problems for councils up and down the country. John Garford (Vice Chairman for Institute of Licensing) has published in the recent edition of Taxi-Point magazine "Never in my 18 years have I seen the trade and councils on the same page on issues". He goes on to say "Hopefully enough respondents to the consultation will convince the DFT that this is not best practice and will only be guidance and therefore won't be adopted" It seems that most councils understand this document has many flaws and have moved away from some of its guidance but unfortunately NNC has adopted it word for word.	
	1.0.8	What disability groups were consulted	The consultation process has been a complete nightmare. The documents are near impossible to find on the NNC website and when you do have to scroll through hundreds of pages of information	
	4.1.7	If your retaining 4 zones why put Retention of these zones will be reviewed following adoption of this policy	Cllr Ekins has already said in a meeting with the trade that the zones will be removed to make it 1 zone.	
	5.12.1.2	Knowledge Test	Again, this has been confirmed by Cllr Ekins in a meeting with the trade that any person undertaking a test will have to know the area of 381sq miles of North Northamptonshire. How do you expect any person to be able to know this? We have already seen a mass reduction of drivers in the trade and drivers continue to leave every week.	
	6.1.1	Vehicle Age limited to a maximum 4 years old	How many perfectly good vehicles are going to be taken off the road due to this ridiculous rule? Again as its an aging industry these owners will simply hand back their plates. Who are you going to replace them with? Anyone new coming into the industry will 1 st have to pass an impossible knowledge test then face cost of up to £600 just to get their licence (which could take up to 3 months). Then pay out £30000 min to buy a vehicle which is 4 year old that meets NNC criteria only for it to	

			be deemed worthless 6 years later as it 10 years old and cant be used by anyone else.	
6.2.16	Electric Vehicles from 2025		Where is the charging infrastructure? These vehicles are a minimum £70000 from new. At the end of ten years what am I supposed to do with the vehicle?? Scrap it?? I can't sell it on as no-one will take it. I'm tied into a finance plan for 5 years so even if at the end of the 5 years if I try to trade it in it has no trade in value as councils a minimum 4 year age policy.	
6.3.6	Hackney's must be black in colour		Why do they need to be black in colour? These are some of the most easily identifiable vehicles on the planet. They come in a range of colour as standard from the manufacturer.	
6.3.13	From 1 April 2025 all new licence applications must be for zero emission vehicles such as self-charging hybrids, fully electric vehicles or hydrogen-fuelled vehicles only. At time of writing plug-in hybrids are not deemed appropriate as they do not have sufficient range to support licensed vehicle use and will spend more time on the fossil fuel engine undermining the aims of this policy		Ok what hackney are we supposed to buy as this rules out the only electric vehicle on the market (LEVC). Nissan Dynamo has stop producing their fully electric vehicle (and it was too small for purpose). Mercedes are yet to launch a fully electric model but when they do the price is expected to be £80000 minimum (with finance £100000). Who actually thought this through before submitting it in the policy????	
	No licences for vehicles fuelled by petrol only or diesel only will be renewed after 31 December 2030. This overrides the upper age policy so whatever the age of the vehicle, the licence will not be renewed when the licence expires after this date		I've just spent £40000 on a new euro 6 spec Mercedes taxi in March 2022 and now it has to be scrapped at 8 years old. Is Diesel fuel no longer going to be available in 2030???	
6.4.4	Drivers of Wheelchair vehicles to be trained		Whilst I agree that this is a good thing, where is the training done? What credentials does this person have to say that they are authorised to train individuals. I could quite easily show another driver how to use the accessibility functions of my taxi but that does not mean I'm qualified as a trainer.	

Please use additional lines or a separate sheet if necessary

2 **Appendix A**

Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary

3	Appendix B			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary				

4	Appendix C			
Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)	

Please use additional lines or a separate sheet if necessary				

5	Appendix D			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
		Position of stands Sports and Social Club – 12 cabs	If this is referring to the old Sports & Social Club, it was turned into a care home many years ago. There is no rank there. What about the ranks on Cardigan Place, Train Station, Asda???	
	15	Table of fares	The proprietor of a hackney carriage shall cause a statement of the fares fixed by Council resolution to be exhibited inside the carriage, in clearly distinguishable letters and figures Interesting as the council keeps saying that we can change our meters and charge lower. How can we do that if the fares are fixed????	
	5.8	Wheelchair training	Whilst I agree that this is a good thing, where is the training done? What credentials does this person have to say that they are authorised to train individuals. I could quite easily show another driver how to use the accessibility functions of my taxi but that does not mean I'm qualified as a trainer.	
	12.0	Vehicle inspection checksheets	Whilst most drivers will know how to do this what training is going to issued to ensure EVERY driver has been adequately trained to do these checks? I'm sure you will want to penalise drivers who fail to do it and you will have to prove that training has been given.	

Please use additional lines or a separate sheet if necessary				

6	Appendix E			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary				

7	Appendix F			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary

8	Appendix G			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary				

9	Appendix H			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary

10	Appendix I			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary				

11	Appendix J			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)

Please use additional lines or a separate sheet if necessary

Do you have any other general comments or observations on the Councils Draft Taxi and Private Hire Licensing Policy and Conditions?

This is an absolute joke. Your asking drivers to look through these policies and respond to them when you'd need a law degree to understand them. Drivers are struggling to apply for their licence renewals online never mind respond to a complex policy like this.

Why even pretend like we have a voice on these issues when the decision has already been predetermined.

Please continue on a separate sheet if necessary

In order to minimise the opportunity of multiple responses from one individual or organisation, anonymised responses will be highlighted as such and may not be given as much weight or credence as other responses. The same will apply to those responses which are not anonymised but which are clearly duplicated.

Please provide the following information:-

Name of respondent [REDACTED]

Representing Organisation (if applicable).....Corby Hackney Owners Association.....

North Northamptonshire Council Licence holder? YES If Yes please state licence number [REDACTED]

Contact telephone number [REDACTED]

Contact e-mail address [REDACTED]

Please note responses received from this consultation may be published in public reports.

If you do not wish your comments to be attributed to you or your organisation in any published report please tick the box below. Please be aware that any submission may still be disclosable:

Thank you for taking the time to respond to this consultation exercise.

Please note that all comments must be received in writing by North Northamptonshire Council by **5pm on 27th July 2022**. Any comments received after this date will not be considered as part of the consultation review.

All responses should be returned to: licensing.BCW@northnorthants.gov.uk **marked** with the subject header titled “**Taxi Consultation response**”.

Or by post to:
North Northamptonshire Council,
Sheerness House,
41 Meadow Road,
Kettering,
NN16 8TL.

Please mark the envelope to Kettering Licensing - Taxis

If you require this document or any related consultation documents in any other format, please contact:
licensing.BCW@northnorthants.gov.uk or

Telephone: 01933 231966