

**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 1<sup>st</sup> June to 27<sup>th</sup> 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)
	4.1.10 & 5.12.1.1	I feel it is Unnecessary for current licence holders to be expected to pass a knowledge test for areas the already work in	Financial burden, no clear guidance of what will happen if knowledge test is failed....will this result in the council making the individual unemployed with a further financial burden of current commitments (vehicle, insurance etc) Vehicle will also be deemed as uninsured if the driver isn't licenced	
	5.12.2.1	No costing identified or details of what actions will be taken if you fail the test	Unknown Financial burden , no clear guidance of what will happen if safeguarding test is failed or how the NNC will support the applicant....will this result in NNC making the individual unemployed with a further financial burden of current commitments (vehicle, insurance etc) Vehicle will also be deemed as uninsured if the driver isn't licenced	
	5.12.3	I feel that as a licensed and active driver for the last 33 years without any accidents or convictions a further driving test is irrelevant unless NNC have received complaints regarding driving standards. As a UK licence holder I fail to see how driving a Taxi supersedes the National driving test Do NNC consider the current National driving test and standard unacceptable if so how can a driver be permitted to drive for the remainder of their licence ?	Financial burden, no clear guidance of what will happen if knowledge test is failed....will this result in the council making the individual unemployed with a further financial burden of current commitments (vehicle, insurance etc) Vehicle will also be deemed as uninsured if the driver isn't licenced	
	5.12.4.1	What relevance does this course have for existing drivers if they can continue to operate until licence renewal	Unnecessary financial burden and contradicting requirements	
	6.1.1.1	The vehicle standard should be taken into account not the age	The age of a vehicle does not determine the condition or standard, this poses an unnecessary financial burden on the applicant	
	6.1.1.4	The vehicle standard should be taken into account not the age	The age of a vehicle does not determine the condition or standard, this poses an unnecessary financial burden on the applicant	
	6.3.12	In the policy objectives 3.1 it states "to encourage a sustainable mixed fleet of vehicles" yet this statement is contradicted in section 6.3.12 "all hackney carriage vehicles being licenced for the	Huge financial burden and contradicting statements  Example of costs to purchase a new LEVC Hackney carriage taxi	

	first time within North Northamptonshire Council must be wheelchair accessible	<p>Vehicle price £57,795  Deposit £3,750  Monthly repayment 60 x £788.74  Final Payment £18,883  Total amount paid over 5 years £69,979.40 including 6% credit charge</p> <p>Please note this is the vehicle only and does not cover electric maintenance insurance etc</p> <p>If you include purchase and insurance the cost would be in excess of £1,333 per month before you turn a wheel...How many hours do you think a driver would be forced to work to cover these cost and make a living. Drivers would be forced to work excessive hours putting the public and other road users at risk</p>	
6.9.7	Drivers cannot maintain a vehicle to a standard where they can guarantee no issues are found. The policy should only cover issues that are of a dangerous nature.	Example: how can a vehicle refused to be licenced as its failed a test due to a headlight blown, this is something that could happen at anytime High risk and potential for immediate financial burden and driver becoming unemployed	
Appendix D 2.2	The council will only licence purpose built hackney carriage vehicle	This contradicts the outline of the policy and the grandfather rights in zone 4	
Vehicle testing 12.1	30 days written records must be kept in the vehicle	This is unreasonable due to restricted storage compartments. This also adds to the environmental impact and paper records should be reduced	
Overall scope	It would appear that this policy hadn't been considered to reflect the local trade	Further comments below	

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?

The financial impact of this policy will deplete the overall fleet of hackney carriage and private hire vehicles by adding additional financial burden into a struggling industry where drivers are barely achieving earnings equivalent to that of the National minimum living wage.

If the cost of a new hackney carriage taxi and insurance are considered alone, the breakdown would be as follows

Annual cost to purchase and insure £15,996

Breakdown of working days

52 weeks @5 days= 260

Statutory public holidays = 8

20 days annual holidays as per government guidelines

Approx. 10 days to include vehicle tests & maintenance

Total working days 222 days

Required earnings to cover vehicle purchase and insurance

£15,996 / 222 days = £72.05 per day

If a driver was to do 3 jobs per hour @ an average of £6 per job his taking would equate to £144 per day based on a 40 hr week. Therefore after taking out expenses for vehicle purchase and insurance alone would be left with £71.95 (x5 = £359.75 per week) to pay all other expenses and live. Based on other deductions/cost I would estimate a drivers earnings to be around £35 per day x 5 = £175 per week....an average earning of £4.37 per hour after expenses

Do you think you could manage?

2022 Min wage = £9.50 x 40hrs £380 per week

This increases to £10.32 per hour in 2023 £412.80 per week

Unfortunately after serving the local council and providing a flawless service to the local community and charities for the last 33 years I would be forced to cease trading and close my business that has been part of my family within the borough of Wellingborough since the launch of the Hackney Carriage licences.

When other people of a similar age are looking to retire I am afraid I will be looking to join the unemployment queue

I would also like to Note:

The current locations of the taxi stands in Wellingborough are not suitable for disabled or physically impaired people and should be considered to be moved to an accessible area (Market street) where the inclines are reduced. I would respectfully request that NNC assess the gradient to access the current stands and prioritise the relocation to assist disabled or physically impaired people, rather than isolating them even further by depleting the local taxi trade.

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).....

North Northamptonshire Council Licence holder? **YES**/NO      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 27<sup>th</sup> 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](mailto: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](mailto:licensing.BCW@northnorthants.gov.uk) or  
Telephone: 01933 231966

