

**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)
	4.1.2	An operator has been advised that the grandfather rights are either 5 years or when the vehicle reaches 10 years old – whichever comes first. Grandfather rights as stated in 4.1.2 are for 5 years from the date this policy is implemented as long as the vehicle has continuously been licenced in that time. So regardless of the vehicle age Grandfather rights will exist for 5 years.		
	4.1.10	The test for drivers for each area I assume is for new drivers only.. So existing ph drivers in WB would not have to sit a test, surely 1 area 1 policy regulated by each area	This section needs to be reworded if this is for “new” drivers. Tests should be the same across the whole NNC authority, administered by each office, harmonising the policies into 1. Not divided up creating chaos and losing yet more drivers.	
	4.2.1	There needs to be a defined timeline for processing new applications – not just processed without delay. As staff are still not back full time in offices this does cause delays as there are only limited appointments.	Potential new drivers lose interest in applying due to time lag.	
	5.6.6	States only DBS’s applied through NNC will be accepted – this would be for new applications once the policy is implemented? Drivers already on the update service under their “old” councils should automatically be accepted too under the transfer to NNC?	Unfair additional costs, update service meant to eradicate this. Time for new dbs is getting worse up to 6 weeks or more, therefore unfair.	
	5.12.1.12	Why would an existing driver applying for a renewal of licence be required to sit a test? You have already accepted that they are fit and proper to be accepted as a driver. This should be for new drivers only and where existing drivers have had a compliant made against then which warrants a retest. Nothing short of an insult to drivers who have held their badges for years		

		without cause for concern.		
5.12.2.2		Safeguarding Test – all drivers in Wellingborough should have passed this test in early 2020 as we were all requested to attend a course, therefore all drivers should already have this certificate.		
5.12.3.5		Why would an existing driver applying for a renewal of licence be required to sit a test? You have already accepted that they are fit and proper to be accepted as a driver. This should be for new drivers only and where existing drivers have had a compliant made against them which warrants a retest. Nothing short of an insult to drivers who have held their badges for years, along with extra costs incurred.	Loss of drivers who can earn more elsewhere, difficult to recruit.	
6.1.1.4		There needs to be a caveat in this section regarding “grandfather rights” of existing vehicles. The council should consider the maximum age of vehicles as buying a vehicle potentially every 10 years would have a huge impact on a business – especially small businesses. A suggestion would be a maximum of 12 years and after 10 years an additional test is carried out on the vehicle. A second suggestion would be that some councils have adopted is that where vehicles are hybrid or Euro 6 diesels these are accepted for a longer maximum period as they are already vehicles with better emissions.	The cheapest 8 seater vehicle brand new – euro 6 is £35000 – if you then added interest at 6% over 5 years you’d add another £10,500 approx to the cost of the vehicle – making it £46500 which is a huge investment for any business and if a business is expected to change a vehicle every 10 years it would no longer be viable. Looking at the main players of new taxis as at today none of the companies are offering full electric 8 seaters either. They are only offering hybrids at a cost of around £43 to £47,000 – again a huge investment which small companies cannot sustain every 10 years.	
6.2.7 and 6.2.9		You state in 6.2.7 that MPV vehicles are allowed allowing 4-8 passengers. Yet in 6.2.9 you state that seating in PH vehicles must be permanent, not be folded away and a clear route out of the vehicle.	The majority of 6 to 8 passenger vehicles are all forward facing seats – therefore to get into the back row you need to flip a seat. If these are not allowed then you eliminate a vast selection of vehicles from being used as taxis, all of which are manufactured in this way and are safe for passengers. The only alternative is a 9 seater conference seating configuration at a cost of over £45000 brand new which would see many individuals and small businesses not being able to afford and put out of business. Most passengers travelling to airports also prefer forward facing seats and not travelling in a backward position. There is no justification for not allowing manufactured purpose built MPV’s with fold down seats.	

6.2.16	<p>April 2025 new vehicles either hybrid or fully electric. Following on from the above point on MPV's – to have an 8/9 seater on the road fully electric with full access would cost in the region of £60,000 – the LDV E80 is the only one I can find that offers this – unless you go for the TX which entry price is the same. It's not "fuel" efficient – only does 120 miles to the charge which would not get you to Heathrow and back without having to stop and charge it. You therefore would end up having to increase prices to pay for the charge waiting time for the driver, so the customers would end up paying more. You may even have to stop en route to Gatwick if there was a traffic jam or you had to divert as Gatwick from WB is approx. 110 miles. Opting for smaller 4-seater would be better value but still the best miles per charge is approx. 280 but then the boot size is too small to hold 4 cases.</p> <p>Such a high investment will certainly see a good majority of small taxi companies and individuals giving up as it would be no longer cost effective to invest. The taxi trade is currently way short of workers, and this would just place it into dire straits.</p>	<p>According to Zap map there are only 7 charging areas currently in Wellingborough covering the whole borough and 42000 across the uk. According to EV-Charger by 2030 there needs to be 2.3 million charging points in the UK – which is 700 new installs every day by 2030. Yet the government has only advised there will be 300,000 by 2030 – which is an extra 258000 in th UK over today's current figure, which by the same percentage as above gives WB an extra 42 charging points for the whole borough.</p> <p>The infrastructure will be totally insufficient as at 2030 to allow potentially up to 200 taxis to charge their vehicles alongside the general public. The infrastructure needs to be in place before you dictate by 2030 we all need to have either fully electric or hybrid vehicles.</p> <p>The cost of installing electric points at home/work premises is between £800 and £1100 – again a cost that we take the brunt off. If an operator has a fleet of say 5 cars that's up to £5500.00 further investment on top of the cost of the vehicles.</p> <p>I would suggest that Euro 6 vehicles and current hybrid vehicles are allowed to continue past 2030 / 10 year rule to allow more time for a more concrete infrastructure.</p>		
6.4.4	This is for new drivers and new vehicles??			
6.5.1	<p>Renewals 6 weeks in advance as 28-day turnaround? Tests on vehicles cannot be done until the 1st day of the month the vehicle expires (so we have been told) – so a vehicle expiring on 31st July cannot go in for its council test at the earliest the 1st July – so the 6 weeks cannot be adhered to unless the council is changing this rule at the test centres. Currently in WB it's 5 working days – so why does it need to be 28 days?</p>			

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)
	9.1	Any passengers under the age of 13? What if the passengers are part of a school contract and all passengers apart from the passenger assistant who has to sit in the back are all under the age of 13 years old. Also size of passenger should be taken into account, 11 year olds are adult size. There needs to be a caveat to this showing this exception.	8 seats become 6, etc as lose 2 seats if rule applied, size should be criteria. not age, as per guidelines.	
	16	All DBS's should be checked for Adult & Children Workforce so that all areas are covered and allows drivers to also work on school contract work without having to obtain a further DBS.	Would ensure all passengers across the spectrum feel safe knowing enhanced DBS covers adult and child workforce. Currently drivers can carry any vulnerable passenger without an enhanced adult & child which could cause an issue should something untoward occur.	

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)
	15.1	Plates on front of the vehicle. On most vehicles the only place to fix the plate correctly is by the grill. However this may cause issues as the air to the grill is blocked which in turn can cause mechanical problems. There needs to be a solution as to the best place where this can be placed without damaging the vehicle.	The badge in the front window should suffice and is renewed when the licence is renewed, preventing issues with the grills and ventilation.	
	App B 13.1 App C 24.2	Lost property – one says to give to Police after 24 hours / other says licensing Team – surely, they should be the same?		

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)

11.3	This needs to be relayed to School contracts at West Northants and North Northants as they expect 6 and 8 seaters to be fully loaded with passengers. If all junior school age then they can't do this. If it only applies to certain sized vehicles than it needs to be made clear what vehicles.		
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				

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

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

To ensure a fair and equal system all areas within NNC should adhere to the same conditions which would then be implemented in each area. Costs should be realistic and fair, currently we have lost a lot of good drivers through covid, where the said drivers found they could use their skills and earn far more money.

DBS must be the enhanced child and adult workforce to maintain and safeguard all passengers, currently drivers who work for the education transport have to have this. Other drivers have a lesser check but still carry vulnerable passengers within their daily runs. The update service should be adhered to as, at present, it is quicker and cheaper to process for the driver and the NNC.

To encourage new drivers is proving extremely difficult and the more obstacles and higher costs put in place the less likely we are to recruit new drivers.

Currently the loss of taxi and private hire drivers is between 40 and 50%.

The only losers then are the public, who are encouraged to use public transport rather than their own vehicles in order to help the environment.

Providing vehicles of 10 years plus are tested 4 monthly and meet the criteria they should be allowed to continue, this would help as it takes a long period of time to get one's money back from new.

Electric vehicles, apart from costs, do not help fulfil contracts as distances are insufficient and become less when faced with traffic jams, traffic lights etc. Drivers will not be able to earn sufficient money to keep going with the present offerings, eventually this might happen.

Re front seat passengers in a full vehicle, some children are almost adult size and some adults are small. Size and common sense should prevail.

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)...Phoenix Cars.....

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 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