

Appendix 3: Officer Comments on Consultation

**Main Document – Licensing Policy**

1	<b>Licensing Policy</b>						
	<b>Section Reference Number</b>	<b>Comment on Policy Section</b>	<b>Likely Impact or Justification For Comment</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Response</b>	
	1.0.4	Groups that use taxis the most are young women and those with mobility difficulties. This seems to be some sort of an assumption.	Taxis are used by a large range of people and policy should not be determined on assumptions. A proper survey should be conducted.		Response 11	This statement is taken from the Department for Transport best practice guidelines document.	
	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.		Response 04	There are statements within the 2022 Best Practice Guidance consultation document which the Authority considers to be best practice irrespective of the consultation and considers them of value to be included. It is noted that no objection has been raised which directly relates to the sections which have been included.	

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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		Response 04	This consultation has required the review of a large number of policies and therefore a significant amount of information needs to be considered in the consultation process.
1.0.9	Consultation will be undertaken before any significant changes are made to the policy.	Given the recent consultation over garden waste collection and the outcome was against the wishes of the residents, how can anyone have confidence this consultation will be fair and not biased?		Response 11	All consultation responses will be fully considered.
2.6	Licence Holders would need sufficient time (to be agreed by both parties) to implement such changes from their existing Licence criteria	Without sufficient time it would impact directly on individuals income and livelihood		Response 07	Grandfather rights have been applied to a number of the suggested policy amendments. Other suggested changes requiring replacement of existing vehicles will not take effect until a future date to be determined by the Council, giving licence holders time to plan for the change.
3.2	Setting standards is essential and long overdue in the interest of safeguarding their passengers/clients, and should be	Without this duty of care and safety standards may be compromised		Response 07	This consultation process has been carried out to allow all operators and

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		discussed one on one with a credible operator who is presently running their business and meeting all the existing requirements of their Local Licencing Authority				proprietors to provide feedback into the finished policy.
3.2	Assessing “fit and proper” persons is in place with Local Licencing Authorities at the present time.	There does not appear, within the current Licencing process, for regular and ongoing policing of driving standards as they appear to deteriorate considerably once licences have been granted. It is likely that Local Licencing Authority may need to monitor/police driving standards by implanting the requirement of “blackbox” technology to record speeding, acceleration, bad driving etc.			Response 07	The Authority will not be requiring any technology to monitor driving standards. Operators and proprietors have responsibility for managing the standards of their drivers while they are at work and are at liberty to install such technology should they wish to do so. Any concerns over driving standards will be dealt with through the normal enforcement process.
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				Response 05	Grandfather rights will exist for 5 years from the introduction of the policy, allowing a one off exemption from the

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		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.				vehicle age requirements as long as the vehicle is maintained in good condition
4.1.2		This is noted but needs further clarification viz a viz "Exceptional Age Vehicles"	Exceptional Age Vehicles are usually of a "classic/specialist genre" i.e. Stretched Limousines and purchased by the Operator to meet the needs of a specific market sector clientele. Thus, by definition, require ongoing investment in order to maintain them in as close to concours condition as can be achieved. Therefore "grandfather rights" would need to last longer than 5 years with this type of vehicle in order for the Operator to achieve a return on his investment		Response 07	The policy allows an older vehicle to continue to be licensed provided it remains in exceptional condition.
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.			Response 08	Grandfather rights will exist for 5 years from the introduction of the policy allowing a one off exemption from the vehicle age requirements as long as the vehicle is maintained in good condition
4.1.7		If your retaining 4 zones why put Retention of these zones will be	Cllr Ekins has already said in a meeting with the trade that the zones will be removed to make it 1 zone.		Response 04	Hackney carriages will continue to operate in zones until such time as

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		reviewed following adoption of this policy				any future decision has been taken regarding the retention or otherwise of zones.
4.1.10	The test for drivers for each area I assume is for new drivers only for each area. So existing hackney drivers for WB zone 4 would not have to sit a test in their own area – they would only need a test if they wanted to ply for hire in Ketteirng?	This section needs to be reworded if this is for “new” drivers.		Response 05	<p>When the new policy comes into effect all drivers will be required to do all tests (with a couple of exceptions). This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders..</p> <p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all</p>	

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						other parts of the new tests.
4.1.10	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			Response 05	<p>When the new policy comes into effect all drivers will be required to do all tests(with a couple of exceptions). This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.</p> <p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.</p>

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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.		Response 08	<p>When the new policy comes into effect all drivers will be required to do all tests (with a couple of exceptions). This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.</p> <p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.</p>
4.1.10	Driver in a zone	This reads that a driver can work in a zone of choice but licensing committee told me personally that		Response 14	The Authority has not removed the zones and the four

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			there will only be one zone consisting of the 4 sovereign area. Which is true?			zones continue to be in effect. The Authority will consider the matter of zones in due course. Hackney carriages will continue to operate in zones until such time as any future decision has been taken regarding the retention or otherwise of zones.
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.				Response 05	A specific time line cannot be defined because process delays caused by the gathering of background information will impact on how long it takes before a licence can be issued. Once all information has been gathered and the application is satisfactory for a licence to be issued this should be done within 10 working days.
4.2.1	There needs to be a defined timeline for processing new applications – not just processed	Potential new drivers lose interest in applying due to time lag.			Response 08	A specific time line cannot be defined because process



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		without delay. As staff are still not back full time in offices this does cause delays as there are only limited appointments.				delays caused by the gathering of background information will impact on how long it takes before a licence can be issued. Once all information has been gathered and the application is satisfactory for a licence to be issued, this should be done within 10 working days.
5.0.2		Dual Badges? Currently WB have 2 separate badges with 2 charges. If badges start at different months currently – when the first expires and a dual badge is applied for, will a pro-rata refund be given for the 2 <sup>nd</sup> badge?			Response 05	The fees for issuing licences relate to the cost of issuing a licence not the period of the licence, so refunds in this scenario will not be applicable.
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?			Response 05	Para 5.6.6 also refers to use of the update service

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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.		Response 08	Para 5.6.6 also refers to use of the update service
5.6.6	Saying will only be accepted through North Northants. Well, that's great, I couldn't apply through East Northants at the time, they asked us to go externally, so I did I went through Beds Boro as I was at the time helping with some school contract work. It's an enhanced check, through the same channels so why cannot I use this? It's already on the update system			Response 09	Para 5.6.6 also refers to use of the update service
5.12.1	While I understand why a knowledge test is needed, it is difficult to understand why seasoned private hire drivers, who have been doing this work for years with no issues, are also being made to sit the test.	It will cause unnecessary stress and paperwork for these drivers, when in reality they have shown through their work, they have the needed knowledge and English proficiency.		Response 02	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.
5.12.1.1	Why would an existing driver applying for a renewal of licence be required to sit a test? You have			Response 05	When the new policy comes into effect all drivers will be

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		<p>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 complaint made against them which warrants a retest. Nothing short of an insult to drivers who have held their badges for years without cause for concern.</p>				<p>required to do all tests (with a couple of exceptions). This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.</p> <p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.</p>
	<p>5.12.1.1</p>	<p>I feel it is Unnecessary for current licence holders to be expected to pass a knowledge test for areas they already work in</p>	<p>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,</p>		<p>Response 05</p>	<p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not</p>

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			insurance etc) Vehicle will also be deemed as uninsured if the driver isn't licenced			need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.
5.12.1.1	Knowledge and driving assessment tests for new and existing drivers.	This is understandable for new drivers, however, what is the point of testing established drivers who probably have unblemished records and 10, 20, 30 or more years of experience?		Response 11	When the new policy comes into effect all drivers will be required to do all tests (with a couple of exceptions). This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.  Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates	

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						<p>to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.</p> <p>Drivers who have already completed the DSA test and can produce their certificate, will not need to resit</p>
5.12.1.1	Geographical knowledge test	Why if a driver wishes to work in a particular zone in which he already works, why the need for another knowledge test? This is just another expense			Response 14	<p>When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.</p> <p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not</p>

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						need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.
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.			Response 04	The Authority currently works in zones for hackney carriages and knowledge tests relevant to those zones will be applied. There is currently no requirement for a knowledge test for the whole of North Northamptonshire.
5.12.1.2	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 complaint made against them which warrants a retest. Nothing short of an insult to				Response 08	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent

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	drivers who have held their badges for years without cause for concern.				standard from day one for all licence holders.  Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test for any other new zones that they wish to work in and all other parts of the new tests.
5.12.2	If the council require drivers to undergo a safeguarding course, it should be provided or paid for by the council.	All major employers provide the necessary training courses required for the job. Or at least reimburse the cost of these courses.		Response 02	Taxi and private hire licensing is legally required to be self funding. All costs for licensing are to be paid by the applicant.
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			Response 08	When the new policy comes into effect all drivers will be required to do all tests. This is a new North

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		course, therefore all drivers should already have this certificate.				Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.
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			Response 05	The failure of any test will require the applicant to successfully resit the test prior to any licence being issued.
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.				Response 05	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.
5.12.3	Existing drivers have already sat and passed this test	It is somewhat arbitrary the council are repeating this test for existing drivers, at the drivers own expense, when they have already shown they have the needed driving skills			Response 02	When the new policy comes into effect all drivers will be required to do all tests. This is a new



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			needed. This will again place yet another financial strain on existing drivers for something they have already shown competency in			North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.
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.				Response 05	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.
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.			Response 08	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.

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						Drivers who have already completed the DSA test and can produce their certificate, will not need to resit
5.12.3.5	Driver tests/Knowledge. All of us registered currently with East Northants would have completed a Knowledge test that is compatible to the area we are operating from, which of course is East Northants, why on earth do I need to know about Kettering/Corby area, the same applies to a driver licensed in their area, why do they need to know about Rushden & Higham. We have technology nowadays, Sat Nav, google maps, and even maps on your phone, please move on with the times				Response 09	<p>Knowledge tests for zones will continue until such time as the Authority reviews zones. There is at this time no requirement for an East Northamptonshire zone driver to complete a Kettering knowledge test unless they wish to hold a Hackney Carriage drivers licence for that area.</p> <p>Drivers holding an existing Hackney Carriage Drivers licence at the time that this policy is implemented, will not need to complete and pass that part of the test which relates to geographical knowledge of the area for that zone. Drivers will still need to complete the test</p>

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						for any other new zones that they wish to work in and all other parts of the new tests.
5.12.3.5	Knowledge and driving assessment tests for new and existing drivers.	This is understandable for new drivers, however, what is the point of testing established drivers who probably have unblemished records and 10, 20, 30 or more years of experience?			Response 11	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.  Drivers who have already completed the DSA test and can produce their certificate, will not need to resit
5.12.3.4/5	Advance driving test... I totally disagree with this proposal, this one proposal as already mentioned above will bring the trade to its knees. I have however no objection to drivers having lessons throughout their period of the license. (Maybe once a year, which could be then passed on to the Council) You could make it mandatory for new drivers to have				Response 09	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day

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	<p>at least one observatory lesson before issuing a license??</p> <p>This should never be a test, but if the assessor thinks the driver's driving is really bad then he should be reported to the Council with immediate effect. Extra lessons should then be taken straight away until the said assessor is confident that the driver is now capable. If after three more lessons he still thinks the driver's driving is so bad, then I am afraid it's time to revoke his license or not issue one!!! But under no way should this be a test you have to pass. I think that's so wrong</p>				<p>one for all licence holders.</p> <p>Drivers who have already completed the DSA test and can produce their certificate, will not need to resit</p>
5.12.4	<p>If the council require drivers to undergo this training, it should be provided or paid for by the council.</p>	<p>All major employers provide the necessary training courses required for the job. Or at least reimburse the cost of these courses</p>		Response 02	<p>Taxi and private hire licensing is legally required to be self funding. All costs for licensing are to be paid by the applicant.</p>
5.12.4.1	<p>What relevance does this course have for existing drivers if they can continue to operate until licence renewal</p>	<p>Unnecessary financial burden and contradicting requirements</p>		Response 05	<p>When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent</p>

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						standard from day one for all licence holders.
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			Response 06	When the new policy comes into effect all drivers will be required to do all tests. This is a new North Northamptonshire Policy and the Authority wishes to set a consistent standard from day one for all licence holders.  Drivers who have already completed the DSA test and can produce their certificate, will not need to resit
5.13.2	10 year end of vehicle rule	Assuming this policy is implemented in late 2022 17 of the 33 HC in Wellingborough will be taken off. 2 of these are WAV's, leaving only 2 WAVS. A year later another 4 HC will need to retire. Therefore 21of the 33 HC will not be licensed . Drivers/operators are unable to afford replacement vehicles with trade as it is			Response 14	By the nature of the way it operates, the Hackney Carriage fleet needs to be as accessible as possible to as many people as possible. The licensing process should not discriminate against sectors of the community.

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						Hackney Carriage Vehicles holding a licence at the time the policy is introduced will have 5 year grandfather rights.
5.13.5	All WAV's	Does the council expect that operators will replace their taxis with WAV's? Very deluded with the result of no HC in Wellingborough in the future			Response 14	By the nature of the way it operates, the Hackney Carriage fleet needs to be as accessible as possible to as many people as possible. The licensing process should not discriminate against sectors of the community.
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 <sup>st</sup> 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.			Response 04	There are a number of statements based on assumption rather than fact in this comment which are not addressed in this response. There are a number of ways in which a vehicle can be "purchased" without the need for the claimed lump sum outlay. Operators and proprietors must now be business planning to future government

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						policy on vehicles not current, which this policy has been designed to drive.
6.1.1	A four year requirement for a vehicle when first registering will place a large financial strain on drivers.	Existing drivers who are due for renewal and have vehicles older than 10 years will have to buy a replacement vehicle. In this current economic crisis when the price of living has increased massively, the requirement to buy a vehicle less than 4 years will be almost impossible for people who are already struggling financially. If possible, raising this age would be more feasible for drivers, with regular vehicle testing such as MOT to ensure the vehicle functions safely.			Response 02	<p>There are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now be business planning to future government policy on vehicles not current, which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.</p> <p>London style cabs (TX series) will now have an age limit of 15 years.</p>
6.1.1	Vehicle Age	Too expensive to buy 4 year old cars			Response 10	<p>There are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now</p>

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						<p>be business planning to future government policy on vehicles not current, which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.</p>
6.1.1.1	<p>The vehicle standard should be taken into account not the age</p>	<p>The age of a vehicle does not determine the condition or standard, this poses an unnecessary financial burden on the applicant</p>			Response 06	<p>The highest emission standards for petrol and diesel cars were not introduced until July 2019 and therefore a four year rule will ensure going forward that that level of emission control is on the vehicle. There are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now be business planning to future government policy on vehicles not current which this policy has been</p>



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						designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.
6.1.1.1	Purchase of a specialist vehicle e.g. Stretched Limousine or Classic Car/Vehicle may (and with classic cars – does) mean that it is more than 4 years old.	Again we would refer to “classic/specialist genre” (as per 4.1.2. above) which would mean that the licenced vehicle would likely be more than 4 years of age. Thus, given that operators meet all the other “exceptional age vehicles” requirements laid down by the local Licencing Authority, as Operators we cannot see why this would or should be a problem.			Response 07	The Authority accepts that there will be specialist cars which may be used for specialist private hire purposes and the type of vehicle will not have been manufactured within the age limit defined. Applications for such vehicles would be considered on their merits by the Authority against the policy.
6.1.1.1	Vehicles older than 4 years not admissible for initial licence or have missed the vehicle licence expiry date.	Why should age be a barrier if the vehicle conforms to test standards?			Response 11	The highest emission standards for petrol and diesel cars were not introduced until July 2019 and therefore a four year rule will ensure going forward that that level of

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					emission control is on the vehicle.
6.1.1.1	<p>I run a Mercedes as I have exempt plates and carry out Executive work. I would have normally changed my car, as I do on average every two years. Due to the Pandemic, I will run the car for another year due to the mileage not being as high as it would have been and also the FACT that used car prices are so high at present. I am currently in discussion with my garage regarding spending £3,500 on a timing chain and new turbo to give me the best chance of the car will give me a good full year. Next year going by your suggested policy I will have to buy a car not older than 2019, at present that would not be sustainable at current prices on the forecourts. The fares we charge would have to go up around 30% to cover the extra cost. I don't think you have thought this one through properly, yet again you haven't allowed for the last two years of the Pandemic. I would however support a policy of FIVE years, with a review in another 2/3 years of reverting back to fours if the economic environment supports it?</p>			Response 09	<p>There are a number of ways in which a vehicle can be "purchased". Operators and proprietors must now be business planning to future government policy on vehicles not current which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.</p>
6.1.1.1	<p>Hackney carriage private hire vehicle age</p>	<p>Currently Wellingborough requires a car to be 5 years old or under to be plated, this is difficult enough without changing it to be 4 years or under. As an operator, this is not financially</p>		Response 12	<p>The highest emission standards for petrol and diesel cars were not introduced until July 2019 and therefore a</p>

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			feasible			four year rule will ensure going forward that that level of emission control is on the vehicle. There are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now be business planning to future government policy on vehicles not current which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.
6.1.1.1	Private hire vehicles, Hackney carriage vehicle age		Drivers can not afford 5 year old vehicles and you are proposing 4 years		Response 13	The highest emission standards for petrol and diesel cars were not introduced until July 2019 and therefore a four year rule will ensure going forward that that level of emission control is on the vehicle. There

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						<p>are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now be business planning to future government policy on vehicles not current which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.</p>
6.1.1.3	Vehicles older than 4 years not admissible for initial licence or have missed the vehicle licence expiry date.	Why should age be a barrier if the vehicle conforms to test standards?			Response 11	<p>The highest emission standards for petrol and diesel cars were not introduced until July 2019 and therefore a four year rule will ensure going forward that that level of emission control is on the vehicle. Licensed vehicles as a general rule cover significantly more miles than usual. They are subject to</p>

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					more wear and tear both mechanically and fixtures and fittings
6.1.1.4	10 year old rule	<p>Companies who have converted vehicles such as Cabs Direct and Sentinel and KPM are slowly going out of business which leads me to the LEVC option the only option. I understand that tge government has an electric mandate but I and you know that this is unrealistic. Provide the taxi trade with hard evidence that there will be sufficient charging points across the whole of North Northants. The costs of owning or should I say lease as you will never ever be able to afford one. They currently cost £68 thousand pounds. Even with a five thousand pound deposit the monthly repayments are over 1000 pounds. If you were sick or dare I say to take a holiday these cost's still need to be made.</p> <p>I for one would never put myself or my family under such duress.</p>		Response 03	<p>The government has stated its policy to meet a global climate change crisis. North Northamptonshire Council has declared a climate emergency and has stated its aim is to be carbon neutral by 2030. This policy is designed to support both of those aims.</p> <p>The proposal to only accept new applications from zero emission vehicles from 2025 has been removed from the policy. The policy will however still require all licensed vehicles to be zero emission from 1 January 2031. All licences for non-zero emission vehicles would expire on 31 December 2030.</p>

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	<p>6.1.1.4</p>	<p>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.</p>	<p>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.</p>		<p>Response 05</p>	<p>There are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now be business planning to future government policy on vehicles not current, which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard. This policy will be subject to review and, going forward, with more information on electric vehicles it may be that the life span of these can be extended beyond the current 10 year requirement.</p> <p>There will be an exception for London style cabs (TX series), which by their design will have a longer life than</p>
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						other vehicle types and these vehicles cannot be more than fifteen years old (from date of registration).
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			Response 05	The highest emission standards for petrol and diesel cars were not introduced until July 2019 and therefore a four year rule will ensure going forward that that level of emission control is on the vehicle.
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	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.			Response 08	There are a number of ways in which a vehicle can be “purchased”. Operators and proprietors must now be business planning to future government policy on vehicles not current, which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and

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		already vehicles with better emissions.				<p>kept to a high standard. This policy will be subject to review and, going forward, with more information on electric vehicles it may be that the life span of these can be extended beyond the current 10 year requirement.</p> <p>There will be an exception for London style cabs (TX series), which by their design will have a longer life than other vehicle types and these vehicles cannot be more than fifteen years old (from date of registration).</p>
6.1.1.4	Licenced vehicle cannot be over 10 years of age.	Purpose built taxis (like buses) are designed and constructed to operate well in excess of 10 years. Does the Council really expect operators to dispose of perfectly good vehicles for an arbitrary rule?			Response 11	The Authority has set an age limit within which it considers that a vehicle can remain safe, reliable and comfortable considering the usage and mileage of vehicles in this occupation.



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						There will be an exception for London style cabs (TX series), which by their design will have a longer life than other vehicle types and these vehicles cannot be more than fifteen years old (from date of registration).
6.1.1.4	Lack of Wellingborough Hackneys	If this is implemented in 2022 Wellingborough will lose 17 HC out of its fleet of 33 with another 4 leaving a year later. With an average of 2 farer per hour drivers will need to leave the trade due to the cost of new taxis			Response 14	<p>Operators and proprietors must now be business planning to future government policy on vehicles not current thinking, which this policy has been designed to drive. Running and maintaining a licensed vehicle is not a cheap occupation and the Authority expects vehicles to be of and kept to a high standard.</p> <p>There will be an exception from the 10 year age limit for London style cabs (TX series), which by their design will have a longer life than</p>

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						<p>other vehicle types and these vehicles cannot be more than fifteen years old (from date of registration).</p> <p>Grandfather rights will exist for 5 years from the introduction of the policy,</p>
6.1.2.3	Two MOTs and Council tests annually.	Why two MOTs ?			Response 11	<p>Licensed vehicles in general cover significantly more miles than the average car user and are therefore subject to more wear and tear on key components. From a public safety perspective the Authority considers that the national standard of the MOT test twice per year ensures that vehicles are properly maintained.</p>
6.1.2.4	Operators will need as a matter of urgency, clarification on reference to a Class 6 MOT for Stretched Limousines	<p>We are unable to find any reference to a "Class 6 MOT"</p> <p>It is important to note that at the present time Stretched Limousines undertake their MOTs as a Class 4</p>	DVLA Website used as point of reference/evidence		Response 07	<p>VOSA Guidance for operators of stretch limousines</p> <p>- <b>In-Service Testing</b> Small limousines will be required to</p>

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			which allows for vehicles carrying up to 8 passengers.			<p>meet the requirements of the Local Authority for being used as a Private Hire Vehicle. Usually this will consist of a Class IV "MOT" at least annually, and may also consist of other bespoke inspections that the Local Authority may stipulate.</p> <ul style="list-style-type: none"> <li>- For Large limousines that are used for hire and reward (as the majority are) they require a Class VI MOT. These MOTs are only available from VOSA – at its own test stations or authorised test facilities.</li> </ul>
6.2.1	An imported vehicle over 10 years of age is EXEMPT from an IVA (Individual Vehicle Approval.)	As stated on the DVLA website	DVLA Website used as point of reference/evidence	Response 07	An IVA shows that an imported vehicle meets environmental and safety regulations and therefore a vehicle without an IVA will not be considered for licensing under	

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					normal circumstances.
6.2.7	<p>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.</p> <p>The definition of an MPV - What is an MPV (multi-purpose vehicle)? MPV is short for multi-purpose vehicle – a type of car generally favoured by families due to a more practical interior than a regular hatchback's, often coming in five- and seven-seat forms.</p> <p>Most MPV's are 7 seats including the drivers' seats with fold down seats to get into the back row. If we are allowed MPV's then as they are mainly manufactured as 7 seats with fold down seats then they should be allowed. Most MPV's hold just as high NCAP ratings as other vehicles so there is no safety issue with using one as a taxi.</p>	<p>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.</p> <p>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.</p> <p>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.</p>		Response 05	<p>MPVs are by design family cars not purpose built licensed vehicles. The rearmost seats tend not to have the same legroom or comfort as the other seats in the vehicle. Access by folding forward the row of seats in front is akin to folding the seats forward in a two door car with four seats. Such vehicles have never been accepted as licensed vehicles. The issue of accessibility is a major consideration for this policy.</p>
6.2.7	<p>It would appear that no reference has been made or is given to Stretched Limousines</p>	<p>Stretched Limousines carrying 8 passengers MAXIMUM plus the driver; this section appears to have been overlooked</p>		Response 07	<p>Section has been added</p>
6.2.9	<p>You state in 6.2.7 that MPV vehicles are allowed allowing 4-8</p>	<p>The majority of 6 to 8 passenger vehicles are all forward facing seats –</p>		Response 08	<p>MPVs are by design family cars not</p>

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		<p>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.</p>	<p>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.</p>			<p>licensed vehicles.          The rearmost seats tend not to have the same legroom or comfort as the other seats in the vehicle. Access by folding forward the row of seats in front is akin to folding the seats forward in a two door car with four seats. Such vehicles have never been accepted as licensed vehicles. The issue of accessibility is a major consideration for this policy.</p>
6.2.9	MPV Vehicle		<p>Allow 6 seater like Zafira and VW Touran</p>		Response 10	<p>MPVs are by design family cars not licensed vehicles. The rearmost seats tend not to have the same legroom or comfort as the other seats in the vehicle. Access by folding forward the row of seats in front is akin to folding the seats forward in a two door car with four seats. Such vehicles have never been accepted as licensed vehicles. The issue of</p>

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					accessibility is a major consideration for this policy.
6.2.9	Private hire vehicle	Many drivers have 6 seater/8 seater vehicles which have fold down seats to ensure customers have access to seating. Customers are all individuals and have different needs. If the policy suggested goes ahead, the vehicles already plated will not meet the new regulations. Drivers and operators are not able to afford purpose built electric cars. I have had a quote from Cab Direct which was £100,000 including interest		Response 12	MPVs are by design family cars not licensed vehicles. The rearmost seats tend not to have the same legroom or comfort as the other seats in the vehicle. Access by folding forward the row of seats in front is akin to folding the seats forward in a two door car with four seats. Such vehicles have never been accepted as licensed vehicles. The issue of accessibility is a major consideration for this policy.
6.2.9	Private Hire vehicles	6 seater and 8 seater vehicles are needed specially for school contracts, if this consultation comes to fruition then 6 and 8 seater vehicles will not be allowed as the seats have to fold to let access on both 6 and 8 seater vehicles. Drivers can not afford purpose built vehicles		Response 13	MPVs are by design family cars not licensed vehicles. The rearmost seats tend not to have the same legroom or comfort as the other seats in the vehicle. Access by folding forward the row of seats in front is akin to folding the seats

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						forward in a two door car with four seats. Such vehicles have never been accepted as licensed vehicles. The issue of accessibility is a major consideration for this policy.
6.2.13	By definition a stretched limousine cannot carry luggage other than small items of hand luggage that can be easily accommodated/carried with and by the passengers.	The original car was designed to take 4 passengers plus their luggage. Now – a stretched limousine carries 8 passengers and thus there is no room for luggage per say.			Response 07	By inference it must be assumed an operator in this circumstance will not take a booking where the transport of luggage is required
6.2.14	As an operator we would like clarification as to the need for this.	The conversion would have been carried out, safety inspections would have been carried out by servicing garage and MOT stations as appointed by the Local Licencing Authority, so we would need to understand why additional expense would have to be incurred to do this and the rationale’.			Response 07	If a car was converted to LPG before September 2010, then a conversion certificate should have been issued by the installer at the time of conversion. The certification process has been replaced by a register held by Liquid Gas UK and the vehicle should be registered. In order to get your vehicle added to the register, if you have a certificate and it

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						was issued by a UKLPG Approved Installer, then this should be sent to Liquid Gas UK for free entry. If a vehicle was not converted by the vehicle manufacturer and no certificate is available then the vehicle must be taken to a UKLPG Approved Autogas Installers who will inspect the conversion and, if satisfactory, arrange for it to be added to the Register.
6.2.16	Electric vehicles	Finding charging ports for electric vehicles will prove very difficult, especially when it is expected all private hire vehicles will be electric or hybrid vehicles in the future. Before setting this as a rule, the council should wait to see whether this would be a feasible expectation. It is also another financial strain on drivers, again making it impossible for drivers to afford in this current economic crisis.		Response 02	The policy relates to zero emissions vehicles. It is anticipated that during the life of this policy and beyond a variety of technologies to meet this requirement will become available. For EVs charging infrastructure is continually improving. The Government has set targets for the introduction of zero	



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						<p>emissions vehicles and it must be expected that they will be met. Businesses will also need to play their part in providing EV charging infrastructure for their fleet.</p> <p>The proposal to only accept new applications from zero emission vehicles from 2025 has been removed from the policy. The policy will however still require all licensed vehicles to be zero emission from 1 January 2031. All licences for non-zero emission vehicles would expire on 31 December 2030. This will increase the time available for infrastructure to be provided.</p>
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		Response 04	The policy relates to zero emissions vehicles. It is anticipated that during the life of this	

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			<p>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.</p>			<p>policy and beyond a variety of technologies to meet this requirement will become available. For EVs charging infrastructure is continually improving. The Government has set targets for the introduction of zero emissions vehicles and it must be expected that they will be met. Businesses will also need to play their part in providing EV charging infrastructure for their fleet.</p> <p>The proposal to only accept new applications from zero emission vehicles from 2025 has been removed from the policy. The policy will however still require all licensed vehicles to be zero emission from 1 January 2031. All licences for non-zero emission vehicles would</p>
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					expire on 31 December 2030. This will increase the time available for infrastructure to be provided.
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</p>		Response 05	<p>Charging infrastructure is continually improving. The Government has set targets for the introduction of zero emission vehicles and it must be expected that they will be met. Going forward electric vehicles may be only part of the solution but if EV is the way forward, then businesses will need to be part of the infrastructure for their fleet.</p> <p>The proposal to only accept new applications from zero emission vehicles from 2025 has been removed from the policy. The policy will however still require all licensed vehicles to</p>

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			year rule to allow more time for a more concrete infrastructure.			be zero emission from 1 January 2031. All licences for non-zero emission vehicles would expire on 31 December 2030. This will increase the time available for infrastructure to be provided.
6.2.16	This important issue affects any and ALL drivers. However, there are a number of important factors that appear to have been omitted or overlooked. Working to eliminate any form of pollutant is a universal goal – however there are those of us in the Private Hire Business (as an example) are very aware of this issue and make every endeavour to minimise our carbon footprint. However, it is important for policy makers within ALL Licencing Authorities to have a full and complete technical awareness of the issues relating to general transportation.	In our particular case our stretched limousine was purchased with an LPG conversion. It's emissions are far LOWER than most conventional petrol engine vehicles. I believe this needs to be taken into account on two counts :	<ol style="list-style-type: none"> <li>1. LPG</li> <li>2. Emissions</li> </ol> <ul style="list-style-type: none"> <li>• From 1.4.2025 – no mention has been made relating to synthetic fuels which are presently being designed and developed to significantly reduce emissions.</li> <li>• Such fuels are being developed by companies such as Shell, McLaren &amp; Porsche plus others and thus for Licencing Policy purposes more than justify investigation on a local level.</li> </ul>	As operated by Vista Limousines & Events V885 EPN Lincoln Town Car Stretched Limousine	Response 07	<p>At 6.2.16 the policy states that the Authority is moving to zero emission vehicles. The Authority cannot foretell what form the power source for these vehicles may take and if synthetic fuels meet the requirement of zero emissions then they will meet this policy.</p> <p>It is not the Authority's policy to provide charging points for specific businesses.</p> <p>The need for zero emission vehicles is National Government policy. This Authority is</p>

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			<ul style="list-style-type: none"> <li>• At this point in time, there is not available an electric/hydrogen stretched limousine!</li> <li>• The Licencing Authority should be prepared to commit, at the earliest possible opportunity, to a sufficient number of electric charging points and assess their practical locations and specifically for use by Private Hire and Hackney Carriages ONLY. These would need to take full cognizance of the technical differences with electric vehicles, i.e. connections and charging power.</li> <li>• Licencing Authorities MUST appreciate and take full cognizance of the extremely high costs of electric vehicles at this point in time and the ability of the Operators to afford the vehicles and the high costs of making the transitions to electric vehicles.</li> <li>• At present the lifespan of the batteries is unknown; this could potentially impact on the purchase of a pre-owned electric vehicle which in turn could create an added financial burden to the Operator!</li> <li>• We must therefore ask the</li> </ul>	<p>For illustration Shell offer such a scheme as does</p> <p><a href="#">Federation of British Historic Vehicle Clubs:</a></p>		<p>using this policy to ensure that the licensed trade in its area prepares and moves towards this requirement in a timely manner.</p> <p>The policy is subject to review and the lifespan of these vehicles for licensing purposes could be extended in the future subject to an evidence base supporting such a change.</p>
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			<p>question - will exceptions be made for “Exceptional Age Vehicles?”</p> <ul style="list-style-type: none"> <li>• On an environmental level – it is important to balance this subject out by recognising that there are organisations and schemes that will offset the carbon footprint by planting trees</li> <li>• Whilst the policy is commendable for investing efforts in the reduction of pollution, it is important not to skirt over or overlook the ethical side effects and the overall environmental damage caused by the mining of materials for batteries/electric vehicles. Lithium leaves pools of toxic waste behind, nickel and cobalt are being mined by children and in bad humanitarian conditions</li> </ul> <p>These are issues that need to be addressed as a whole, not in part on a national or local level, nor indeed just for Private Hire.</p> <p>This is a critical issue and a circular one and involves far more than policy implementation for Private Hire. “Doing one’s bit” requires the same effort by the super powers if the whole plant is to benefit.</p>			
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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>		Response 08	<p>This view is based on EVs. The Authority's policy asks for zero emission vehicles in line with Government policy and it is to be hoped than in due course other technologies which do not rely on charging will be introduced.</p>
6.2.16	<p>Electric Vehicles... I am dead against this proposal, it's a nonsense, far too early to</p>			Response 09	<p>This is about the global climate change crisis. This</p>

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		implement a badly thought out policy The Government law is 2030 for NO NEW COMBUSTION ENGINES. We are not a metropolitan area, our area is mainly rural. Again the Electric vehicle in my line of work will be out of my reach financially. Most local drivers will also struggle with the four-year rule buying an Electric car. The Electric car is still in it's infancy, we need better range, and of course, so they are more affordable, at least change this rule until 2030 with a possibility of a review then?			policy is about getting businesses to plan for the future which is not a choice of this Authority but a national Government policy.
6.2.16	Emissions	Corby has very open streets and green areas. There are no narrow streets with large imposing buildings, as such, it must be one of the most under polluted towns in the country. the same can be said for most of North Northamptonshire. The government is not banning petrol and diesel vehicles on the road (even when they are no longer available to buy in 2030). Why does the Council see fit to ban these vehicles? As the consultation paper ratifies Hackney Carriages as a form of public transport, can it therefore be assumed that buses will be similarly affected by the emissions and 10 year age limit or is the Corby Hackney Carriage trade being unfairly persecuted?		Response 11	This is not about this area but about the global climate change crisis. This policy is about getting businesses to plan for the future which is not a choice of this Authority but a national Government 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.		Response 04	The reference to "the most easily identifiable vehicles on the planet" is not clear. Hackney carriages come in a



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						<p>variety of shapes, some of which to the public are no different to some vehicles used as private hire vehicles.</p> <p>Section 48 of the Local Government (Miscellaneous Provisions) Act 1976 states “not of such design and appearance as to lead any person to believe that the vehicle is a hackney carriage”. Because of the mixed state of the private hire fleet across North Northamptonshire, colour is the one clearly defining factor by which to identify the two types of vehicle.</p>
6.3.6	All new Hackney Carriages must be black in colour	Surely this is a backward step? This rule was abolished over 30 years ago. All major cities have vehicles of different colours.			Response 11	<p>Hackney carriages come in a variety of shapes, some of which to the public are no different to some vehicles used as private hire vehicles.</p>

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						Section 48 of the Local Government (Miscellaneous Provisions) Act 1976 states “not of such design and appearance as to lead any person to believe that the vehicle is a hackney carriage”. Because of the mixed state of the private hire fleet across North Northamptonshire, colour is the one clearly defining factor by which to identify the two types of vehicle.
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 first time within North Northamptonshire Council must be wheelchair accessible	<p>Huge financial burden and contradicting statements</p> <p>Example of costs to purchase a new LEVC Hackney carriage taxi            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</p>		Response 05	By the nature of the way it operates, the Hackney Carriage fleet needs to be as accessible as possible to as many people as possible. The licensing process should not discriminate against sectors of the community.	

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			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			
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????		Response 04	Zero emission vehicles are government policy. By the nature of the way it operates, the Hackney Carriage fleet needs to be as accessible as possible to as many people as possible. The licensing process should not discriminate against sectors of the community.	
6.3.13	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??? How are you possibly going to attract people to invest in this industry??		Response 04	National government policy is to have zero emission vehicles. North Northamptonshire Council' has declared a climate emergency and the council's stated aim is to be carbon neutral by 2030. The industry needs to be preparing now for these changes.	

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6.3.13	Self Charging WAV	The current price of a self charging WAV is currently around £50,000 yet the council expect drivers to be able to afford these on current takings? This will be the death for taxis in Wellingborough		Response 14	National government policy is to have zero emission vehicles. North Northamptonshire Council has declared a climate emergency and the council's stated aim is to be carbon neutral by 2030. The industry needs to be preparing now for these changes.
6.4.1	<p>"Rear loading will only be permitted where a suitable tail lift is in use."</p> <p>Small WAVs (&lt; 4 hirers) would not have room for a tail-lift mechanism. In this instance, a rear loading ramp is preferable.</p>	Small ex 'Mobility' vehicles that may be subsequently licensed for hire all have rear loading ramps	In our experience over the last 9 years, rear loading WAV's with ramps are much preferred by customers compared with side loading ramps due to the angle of the ramp and headroom available for the passenger during loading.	Response 01	This has been amended to allow rear loading ramps to be used where an electric winch is installed and used for the loading and unloading of passengers in wheelchairs.
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.		Response 04	Training will be organised by the Authority.
6.4.4	This is for new drivers and new vehicles??			Response 05	All drivers will be required to

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						undertake all training applicable to their licence. This is a new North Northamptonshire Policy and all licence holders will be required to meet the standards therein to ensure a consistent and transparent licensing process.
6.4.4	This is for new drivers and new vehicles??				Response 08	All drivers will be required to undertake all training applicable to their licence. This is a new North Northamptonshire Policy and all licence holders will be required to meet the standards therein to ensure a consistent and transparent licensing process.
6.5	Why has the length of time for an application increased to at least 6 weeks?	This is not practical from a planning view point as the second or third test (as required by Licencing) will keep moving	Example: Any car that requires by Licencing to have 2 combined tests per year, i.e. 6 months apart, then the first test will be at 6 months and thereafter would be at 4 or 5 months, and that will keep rolling forward	Response 07	This is a valid comment. To allow vehicle testing to take place the application must be submitted at the prescribed time periodssbut the licence will not be issued until a	

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				making planning very difficult for the Operators and possibly the Test Centres.		satisfactory test result is received
6.5.1	Renewals 6 weeks in advance as 28-day turnaround? Tests on vehicles cannot be done until the 1 <sup>st</sup> day of the month the vehicle expires (so we have been told) – so a vehicle expiring on 31 <sup>st</sup> July cannot go in for its council test at the earliest the 1 <sup>st</sup> 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?				Response 05	This is a valid comment. To allow vehicle testing to take place the application must be submitted at the prescribed time but the licence will not be issued until a satisfactory test result is received
6.5.1	Renewals 6 weeks in advance as 28-day turnaround? Tests on vehicles cannot be done until the 1 <sup>st</sup> day of the month the vehicle expires (so we have been told) – so a vehicle expiring on 31 <sup>st</sup> July cannot go in for its council test at the earliest the 1 <sup>st</sup> July – so the 6 weeks cannot be adhered to unless the council is changing this rule at the test				Response 08	This is a valid comment. To allow vehicle testing to take place the application must be submitted at the prescribed time but the licence will not be issued until a

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		centres. Currently in WB it's 5 working days – so why does it need to be 28 days?				satisfactory test result is received
6.6.3	Full clarification of this point in respectfully requested	Essential understanding necessary for those Operators who may wish to sell their businesses or an Owner/Driver who may wish to sell his vehicle		Response 07		Any transfer of vehicle will result in the cancellation of any grandfather rights applicable to that vehicle. The new policy conditions will apply to the new licensee.
6.9.3	Highly unlikely to be able to operate under such outgoings	This would have a huge impact on my employee and me personally and I also count my family being directly harmed by this policy if it were to go ahead. My vehicle is 12 years old. In fact I have just sold my previous vehicle which was 3 years old as I deemed it unfit for purpose. Break downs constantly huge repayments even when it was broken down not to say paying an employee this not paying myself. The practicality of an Electric Hackney vehicle and the running costs frighten me and others in the trade may I suggest.		Response 03		Para 6.9.4 refers to exceptional condition.
6.9.6	Exceptional Condition	This seems wholly discriminatory as my own vehicle now is in outstanding condition for age. This in my opinion should be across the board regardless of age.		Response 03		It must be clear that exceptional condition is not outstanding condition. It is not expected that many vehicles used as hackney carriages and private hire vehicles will qualify for this requirement

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						<p>at the end of their life as determined by this policy. A vehicle of “exceptional condition” is one where the components i.e. mechanical, body panels, paint and trim are in an exceptional condition with regard to the age of the vehicle. The image of an exceptional older vehicle upholds the standards normally set by a much younger vehicle. If a vehicle is in exceptional condition then the Authority has the flexibility to licence it for a further period.</p>
6.9.7	<p>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.</p>	<p>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</p>			Response 06	<p>Exceptional condition relates to the mechanical, bodywork and interior condition of the vehicle and that this has been maintained properly throughout the life of the vehicle. A blown bulb is not a measure of the</p>



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					condition of the vehicle.
6.9.7	Exceptional condition policy	Vehicles subject to the exceptional age policy will not be considered for relicensing if they fail any test. For clarification purposes, does this include an initial test and retest (e.g. a brake bulb could easily blow on the way to the test station and render a fail, but the vehicle itself would be fit for the road otherwise)?		Response 11	Exceptional condition relates to the mechanical, bodywork and interior condition of the vehicle and that this has been maintained properly throughout the life of the vehicle. A blown bulb is not a measure of the condition of the vehicle.
6.9.9.	Point 1V	Generally there will be some sign of rust on most vehicles of any age, including those under 5 years of age. Weather conditions and bad road maintenance all contribute to damage to any coatings on the underside of a car which can lead to rusting and often very quickly by virtue of the weather conditions in the UK	Any rust or deterioration issues should be identified at the time of the MOT and should be dealt with at that time. There are technical issues attached to these points i.e. surface rust versus severe rusting that can cause structural issues. Any such issues can occur BETWEEN TESTS.	Response 07	It must be clear that exceptional condition is not outstanding condition. It is not expected that many vehicles used as hackney carriages and private hire vehicles will qualify for this requirement at the end of their life as determined by this policy. A vehicle of "exceptional condition" is one where the components i.e. mechanical, body panels, paint and trim are in an

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						<p>exceptional condition with regard to the age of the vehicle. The image of an exceptional older vehicle upholds the standards normally set by a much younger vehicle. The expectation is that the vehicle will have been maintained properly throughout the life of the vehicle in accordance with the manufacturer's maintenance schedule. It would be expected that in a vehicle of exceptional condition that rust has been properly managed.</p>
6.9.9	Authorised officer of the Council	Will the officer of the Council inspecting the vehicle have any mechanical/motor qualifications? The officer should be suitably qualified to make a legitimate decision.		Response 11	All vehicle inspections will be undertaken by the test centres to the Authority's specification.	
6.9.10	Judging the merits of the condition of the vehicle	Who makes that judgement and based on what knowledge base/qualification?		Response 07	All vehicle inspections will be undertaken by the test centres to the Authority's specification.	

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6.10.2	Plates... I travel to Heathrow and all the major airports every day, I think I have only ever seen plates displayed on the front of a licensed vehicle only once. Now bearing in mind this doesn't actually affect me? Why? Why the need to put plates on the front of the vehicle. A decent plate on the back of the vehicle is more than enough to notify the public it is a licensed vehicle			Response 09	Licensing of hackney carriages and private hire vehicles relates to public safety. The front plate is another means of identification of the vehicle, especially by CCTV systems.
6.11.5	Advertising panel	To limit the advertising space to 2 x 45cm x 60cm is an outdated policy. Current rules allow for taxis to have full wrap advertising.		Response 11	The Authority's policy requires hackney carriages to be black and therefore a full body wrap would not be acceptable.
8.1.3	This point needs revisiting by Licencing.	If an Operator elects to purchase an imported Special Occasion Vehicle which has been in the UK for some time, how can that Operator evidence legal importation? Certain assumptions have to be made by the Operator therefore Licencing would need to issue certain guidelines. One also has to assume that if a vehicle has a V5 then it will have been imported legally!		Response 07	In relation to public safety the Authority will not make assumptions. Evidence of legal importation, testing and registration will be required.
8.1.5.	American Stretch Limousines	This can also easily be proven by the VIN		Response 07	The operator will need to prove that the vehicle has been

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						modified in accordance with this section.
8.1.7	Full clarification of this point in respectfully requested	SVA has been replaced by the IVA. Will Licencing now please confirm that this will be a voluntary IVA		Response 07		Statement is correct – vehicles will now have an IVA.
8.1.8	Inspection by Authorised Officer of the Council	Who makes that judgement and based on what knowledge base/qualification?		Response 07		Officers can make a judgement based on the evidence provided to comply with this policy. The vehicle also needs to undergo a Council test at a test centre.
8.1.11	How does an Operator acquire conformity certification for seat belts, if required	This is the first time this Operator has seen such a request/requirement and presumably this would be covered by the vehicle's insurance policy.		Response 07		Paragraph updated - Imported vehicles will be required to pass an IVA which includes assessment of the seat belts in the vehicle to an accepted standard.
8.1.12	Driver/Passenger partitions	Some stretched limousines are only built with a solid partition and usually these are left down. In such a case where it needs to be raised would CCTV be an acceptable option or would it need to be disconnected. If it is disconnect then the hirer will not be afforded privacy if they should request		Response 07		The licensing regime is designed to protect public safety. A vehicle designed so that the driver cannot see what is happening in the rear of the vehicle is

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			it.			not suitable as a licensed vehicle. The screen should not be raised to obscure the driver's view.
8.20	Exemption Plates... Business proposal?? I run on exempt plates have just submitted my renewal and was asked to supply some kind of evidence. So I did I listed most of the companies I carry out work for. Surely there is no need to go further than this? I can't ask my clients for some sort of proof, that would be so unprofessional, who the hell thought this one up? I except for car needs to be "Immaculate" too, but you have to have a little tolerance, for god's sake, they are working cars, you will get the odd stone chip, (Gritter lorries!) or dare I say a little scratch. You can't afford to have the car resprayed every two or three months. I have just had my Alloy wheels renewed, yes they did need doing and at great expense, I took the decision knowing I was keeping the car				Response 09	The Authority may exempt the display of licence plates. This policy details the requirements for an exemption to be permitted. Where the Authority has reason to suspect that a vehicle with plate exemption is not being used for the approved purpose then relevant information will be requested.
8.2.4	We belie this may be affected by GDPR and Commercially Sensitive Information	If a client wishes absolute privacy when arranging a hire, Operators are obliged to adhere to such requests. In addition billing arrangements between companies should remain Company Confidential.		Our own experience of Celebrity request and a specific request from a member of the public	Response 07	The licensing regime is designed to protect public safety. Exempting a vehicle from displaying plates removes some of that

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						protection. Therefore the Authority needs to be satisfied that the exemption is being used in a situation which warrants it. Where the Authority has reason to suspect that a vehicle with plate exemption is not being used for the approved purpose then relevant information will be requested.
8.2.6	Exemption from display of plates viz a viz type of work undertaken	<p>This is an important consideration when hire is made by celebrity/dignitaries etc. (and the associated security implications.)</p> <p>Equally for obvious reasons, neither weddings, nor funerals should be expected to utilise limousines with external plates, neither function requires operator to have PHV and our limousines are used for both event types.</p> <p>We need to understand the reasoning behind the need for American stretched Limousines and “novelty vehicles” to be plated as this is not something we are aware of with other</p>			Response 07	<p>The Authority accepts that when hire is made by celebrities/dignitaries etc. that there may be associated security implications. Plate exemption for appropriate vehicles will be given in such circumstances. This is not the general role of the stretched limousine which may be used for prom nights, hen nights, etc. These circumstances do not warrant plate exemption as public safety overrides any</p>

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			Licensing Authorities.			risks to the passengers from the usage.
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2	<b>Appendix A</b>					
	<b>Section Reference Number</b>	<b>Comment</b>	<b>Likely Impact or Justification</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Response</b>
	2.2	There is no reason why a hackney or PH driver having held their licence and being accepted as fit and proper should have to sit a driving or theory test at renewal – unless there has been a complaint made against that person which justifies a retest or they have had points on their licence since the last renewal. A money-making opportunity that is not a necessity			Response 05	The proposed policy sets new consistent standards for those holding or wishing to hold private hire or hackney carriage related licences with North Northamptonshire Council and so all licence holders are expected to reach and maintain the same standard.
	2.2	There is no reason why a PH driver having held their licence and being accepted as fit and proper should have to sit a driving or theory test at renewal – unless there has been a complaint made against that person which justifies a retest or they have had points on their licence since the last renewal. A money-making opportunity that is not a necessity	Additional costs are unfair and off putting for drivers.		Response 08	The proposed policy sets new consistent standards for those holding or wishing to hold private hire or hackney carriage related licences with North Northamptonshire Council and so all licence holders are expected to reach and maintain the same standard.



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	<p>Table 1</p>	<p>Serious issues surrounding the following :</p> <p>“Convicted of a crime which resulted in the death of another person or was intended to cause the death or serious injury of another person”</p>	<p>As a general statement this is understandable however, totally impractical and totally unjust. EACH APPLICATION should be thorough evaluated by qualified individuals who have a FULL understand or the specific case and other licencing requirements e.g. PSV.</p> <p>If an applicant has served their time specifically relating to the issue of death, and have actually been reissued with other passenger carrying licences i.e. PSV and are also able to carry passengers in non-PHV vehicles i.e. for weddings, then it is not logical for them to be denied another licence as this restricts their ability to earn a living.</p> <p>Simple example:</p> <p>A wedding limousine WHICH IS NOT on a Private Hire Licence can be driven by such an individual</p>	<p>Specific reference is offered by virtue of this Operators direct experience with a highly qualified applicant during 2022.</p>	<p>Response 07</p>	<p>The Licensing Authority is responsible for ensuring the public safety of those who come into contact with the hackney carriage and private hire trade. They are required to ensure that any licence holder is safe and suitable (fit and proper). Any and all criminal convictions (apart from “protected convictions” and “protected cautions” where they have been declared) can be taken into account by the local authority in assessing safety and suitability, but only relevant spent convictions should be considered by the decision maker. The Authority has a policy against which any convictions are considered. Each application will be assessed on its own merits against the</p>
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			<p>The same wedding limousine WHICH DOES CARRY a Private Hire Licence - CANNOT be driven by that same individual</p> <p>It must be borne in mind that such an individual effectively carries a “life sentence” by causing said death, and it is unjust and unfair that they should be penalised still further, especially when they are undertaking the same employed Licenced (PSV) chauffeuring/driving duties elsewhere and not requiring a Private Hire Licence.</p> <p>Equally when that individual is able to provide references of his driving/chauffeuring experience within the Royal Household and for senior officials of The Police Force, full cognizance should be taken of their trust and confidence in being driven safely.</p> <p>We do feel, however, that a</p>			<p>policy and specific circumstances will be taken into account when decision making.</p>
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			sensible but reasonable period between the return/removal of licence/points, the full discharging of the sentence, should be seriously considered in order NOT to make a nonsense of such policies/examples as shown and highlighted above.			
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3	<b>Appendix B</b>						
	<b>Section Reference Number</b>	<b>Comment</b>	<b>Likely Impact or Justification</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Response</b>	
	2.8	Handing licence to employer	A self employed driver may be employed by different operators. I do not see why self employed drivers must hand in their license to one operator, especially when this is not required in other fields of work.		Response 02	<p>For hackney carriage drivers the requirement to give their licence to proprietor is in Town Police Clauses Act 1847.</p> <p>For private hire drivers the requirement is a condition of their licence made under the Local Government (Miscellaneous Provisions) Act 1976.</p>	
	3.7	In the first instance the Driver should report directly to his Operator and the Operator then report to Licencing, Police, Crimestoppers.	Paper trail especially if a serious incident occurred or likely to occur. Accessibility to these agencies 24/7 – not always possible. Ongoing support from the Operator should this prove necessary.		Response 07	This section relates to safeguarding. If a driver sees something of concern then they should report it directly to one of these agencies by phone or email at the earliest opportunity.	
	9.1	Any passengers under the age of 13? What if the passengers are part of a school contract and all passengers apart from			Response 05	It has been confirmed with School Transport Services that there are	

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		the passenger assistant who has to sit in the back are all under the age of 13 years old. There needs to be a caveat to this showing this exception.				times when an under 13 will be required to travel in the front seat and they have requested an exemption from our condition for this reason. Policy to be amended accordingly.
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.			Response 08	It has been confirmed with School Transport Services that there are times when an under 13 will be required to travel in the front seat and they have requested an exemption from our condition for this reason. Policy to be amended accordingly
13.1	Appendix B 13.1 Appendix C 24.2 Lost property – one says to give to Police after 24 hours / other says licensing Team – surely, they should be the same?				Response 08	This comment is valid and agreed – the policies will be amended to be consistent,
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.				Response 05	The checks that the Licensing Authority can legally carry out are restricted by the DBS. The level of check required for school contracts is not accessible to licensing authorities.

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	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.		Response 08	The checks that the Licensing Authority can legally carry out are restricted by the DBS. The level of check required for school contracts is not accessible to licensing authorities.
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4 Appendix C						
Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)	Cross reference number to original comments document	Response	
3.2	<p>“Tailgates and rear doors must only to be used for loading/unloading luggage or as an emergency exit, unless the vehicle has been designed, modified or adapted to carry wheelchair bound passengers, and has the relevant M1 or M2 Type Approval Certificate, in which case the rear doors may be used for loading those passengers only.”</p> <p>If a small WAV is being used for a non-wheelchair passenger or a passenger who has transferred from a wheelchair or mobility scooter, the rear tailgate (and ramp) may well be used to load luggage or an empty wheelchair or mobility scooter.</p>	We have been doing this for 9 years.	In our experience over the last 9 years, the real tailgate of a small WAV's is often used to load luggage and/or an empty wheelchair / mobility scooter.	Response 01	It is unclear what this point is highlighting. If it is that the rear door must only be used for passengers in wheelchairs and nothing else, this is not the intended meaning. With regards to the access and egress of passengers to the vehicle, only passengers in wheelchairs should access/egress via the rear door but the rear door can be used for the loading of other items.	
11.2	All Private hire Vehicles should be specifically SANITISED between hires.	Prevention of spread of Covid-19 and similar pandemics, viruses. Mere cleaning cannot guarantee to be clean enough.		Response 07	COVID 19 control measures are a health and safety requirement and do not need to be covered by the policy or conditions	
11.3	Natural day to day wear and tear will occur on all vehicles and Licencing need to set a minimum standard acceptable which can	To meet the requirements of 11.3		Response 07	Vehicles are expected to be maintained in good condition. “Natural day to day wear and tear” is	

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		be policed and monitored during the routine Council test				expected to be appropriately managed by the vehicle proprietor, operator or owner to ensure a good standard is maintained.
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.			Response 05	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it can be talked through with the plate supplier.
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.		Response 08	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it can be talked through with the plate supplier.
15.1	Front Plate		Blocking air vents and blocks various sensors	Manufacturer	Response 10	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it



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						can be talked through with the plate supplier.
15.1	NNC Identification plate	<p>Ventilation systems at the front of the vehicle. This is where you have proposed to place another identification plate. Having this plate covering essential safety features of the car is dangerous, risking the lives of drivers and passengers. If anything were to happen to the car e.g. catches fire who is liable.</p> <p>What is the need to have multiple identification plates?</p>	Manufacturers Guide	Response 12	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it can be talked through with the plate supplier.	
15.1	Identification plate	<p>Having a front plate is a very bad idea as this will result in blocking safety features of modern vehicles such as optical parking sensors, front parking camera, front radar sensor, front adaptive cruise. Furthermore it will impact the vehicles ventilation systems by blocking airflow to cool the vehicle. Blocking will cause the vehicle to catch fire, will NNC take responsibility for damages.</p>		Response 13	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it can be talked through with the plate supplier.	
16.2	Permanent door signs	<p>As a private hire driver, I use my own vehicle for private hire work. The rule for permanent affixed signage is unnecessary, especially when we are already required to have council plates placed at the front and back of the vehicle. The council plates alone are more than sufficient in identifying a vehicle as private hire. It is also not a</p>		Response 02	Private hire vehicles are private hire vehicles 24 hours, 7 days per week. The vehicle is required to display such signage and plates as the Licensing Authority considers appropriate for public safety all of the time.	

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			requirement in your neighbouring council (Northampton) and allows greater flexibility for private hire drivers to use their own car.			
17.0	Full clarification and reasoning of this point in respectfully requested				Response 07	This is to inform emergency services in the event of an incident involving the vehicle.
24.2	Appendix B 13.1 Appendix C 24.2 - Lost property – one says to give to Police after 24 hours / other says licensing Team – surely, they should be the same?				Response 05	This comment is valid and agreed – the policies will be amended to be consistent,
24.2	Appendix B 13.1 Appendix C 24.2 Lost property – one says to give to Police after 24 hours / other says licensing Team – surely, they should be the same?				Response 08	This comment is valid and agreed – the policies will be amended to be consistent,

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5	<b>Appendix D</b>						
	<b>Section Reference Number</b>	<b>Comment</b>	<b>Likely Impact or Justification</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Response</b>	
	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		Response 06	Grandfather rights override the policy requirements for the period of the grandfather rights	
	2.2	Need Saloon Hackneys	Need saloons for elderly		Response 10	There is no evidence to indicate that this is the case. Private hire vehicles continue to be saloon cars and therefore meet the needs of this sector of the community. Both Kettering and Corby zones have run only purpose built wheelchair accessible hackney carriages for a number of years with no issues raised.	
	2.2	Saloon Hackney Carriage vehicles	Elderly customers prefer saloon vehicles due to easier access. Taxi services needs to be able to meet individual needs of customer, this can be achieved with a mix fleet		Response 12	There is no evidence to indicate that this is the case. Private hire vehicles continue to be saloon cars and therefore meet the needs of this sector of the community. Both Kettering and Corby zones have run only	

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						purpose built wheelchair accessible hackney carriages for a number of years with no issues raised.
2.2	Saloon Hackney Carriage Vehicles	Need mixed fleet to cater for all		Response 13		There is no evidence to indicate that this is the case. Private hire vehicles continue to be saloon cars and therefore meet the needs of this sector of the community. Both Kettering and Corby zones have run only purpose built wheelchair accessible hackney carriages for a number of years with no issues raised.
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.		Response 04		Suitable training providers will be sourced.
7.0	Fire Extinguisher	Without training a fire extinguisher can cause more damage. These should be removed from All vehicles		Response 14		This remains a requirements within the council byelaws so cannot be removed at this time
8.0	First Aid Kit	Who is the first aid kit supposed to be used by? A driver could cause more harm to a passenger without training		Response 14		The first aid kit is for the drivers own use

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12.0 12.1	Vehicle inspection check sheets	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.		Response 04	A driver of any vehicle should be capable of carrying out a fundamental vehicle check to make sure that it is fit for use on the road.
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		Response 06	Agreed – documentation held should be for that day – previous six months to be held by proprietor and readily accessible to authority inspector or police officer.
15.1	Front Plate	Blocking air vent and sensors	Manufacture	Response 10	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it can be talked through with the plate supplier.
15.1	NNC Front Plate	Having a front plate covering and blocking safety feature-ventilation – vehicle may catch fire	Vehicle manufacturers guide	Response 12	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a

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						particular vehicle it can be talked through with the plate supplier.
15.1	NNC front vehicle identification plate	Blocking sensors, blocking ventilation system, will over heat vehicle and will cause vehicle fire			Response 13	There is no evidence of problems to date. The Kettering area has been running front plates for many years with no issues. Should an issue or concern be identified with a particular vehicle it can be talked through with the plate supplier.

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5	<b>Appendix D – Zone 2 Corby</b>						
	<b>Section Reference Number</b>	<b>Comment</b>	<b>Likely Impact or Justification</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Responses</b>	
	Zone 2 – Corby	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???		Response 04	Appendix D states the sovereign authority wording in the byelaws applicable to that zone. Historically byelaws contained the location of hackney carriage ranks in the area but no longer need to. However the location of old ranks are still included and will continue to be in the text until such time as they are updated or replaced	
	Zone 2 – Corby Point 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		Response 04	Misunderstanding of the fixing of <u>maximum</u> fares.  Hackney proprietor can also display their own rates less	

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			saying that we can change our meters and charge lower. How can we do that if the fares are fixed????			than Authority maximum as long as it is clear to passengers that this is the case and the council set maximum fares are also displayed.
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6	<b>Appendix E</b>						
	<b>Section Reference Number</b>	<b>Comment</b>	<b>Likely Impact or Justification</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Response</b>	
	4.9	Sub-contracting - how do you wish this to work. We would need to know whether the sub-contractor operators under North Northants Conditions and paperwork or the condition of whoever they are Licenced with.	Clarification for record keeping and to ensure no breach of licencing conditions.		Response 07	Legislation permits bookings to be subcontracted to any other licensed operator in or out of the area of the licensed operator.	
	9.2 and 9.4	Why has the period of record keeping increased from 12 months to 3 years. What is the edict for retaining records for such a long period.	GDPR, any inspection during the following 2 years will only show records for 12 months – not 3 years – as anything over 12 months old will have been destroyed as per GDPR requirements.		Response 07	GDPR does not require records to only be kept for 12 months. The Local Authority requirement for records to be kept for 3 years becomes the GDPR requirement.	
	9.5	Full clarification point referring to “10.4 above” is respectfully requested	Does it refer to another appendix?		Response 07	Paragraph 9.5 should refer to 9.3 and not 10.4	

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	11.3	This needs to be relayed to School contracts at West 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.			Response 05	It has been agreed with the School Transport Team that where a contract requires a child under 13 years of age to be carried in the front seat then an exemption to 11.3 applies.
	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.			Response 08	It has been agreed with the School Transport Team that where a contract requires a child under 13 years of age to be carried in the front seat then an exemption to 11.3 applies.

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7	Appendix F						
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)	Cross reference number to original comments document	Responses	
	2.4	We would reiterate that a vehicle over 10 years of age is exempt from an IVA	As previously noted	DVLA website	Response 07	An IVA shows that an imported vehicle meets environmental and safety regulations and therefore a vehicle without an IVA will not be considered for licensing under normal circumstances.	
	2.5		As previously covered		Response 07		
	2.14	Full clarification and reasoning of this point in respectfully requested	Earlier in the document the referenced age is 13 years and we need to know which it should be.		Response 07	For the purposes of Special Occasion Vehicles the age limit for adult supervision is under 16.	





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10	<b>Appendix I</b>					
	<b>Section Reference Number</b>	<b>Comment</b>	<b>Likely Impact or Justification</b>	<b>Reference to Evidence (if applicable)</b>	<b>Cross reference number to original comments document</b>	<b>Response</b>
	1.3 and 1.7	Previously limousines have been exempt from displaying external Licence Plates	For example a PROM is NOT a private hire duty per say but considered a “life event” and therefore a special occasion hire. As limousines that we also use for weddings, having an external licence plate would not be acceptable to the client (Bride/Groom/Entourage) and indeed weddings are NOT covered by the Private Hire Licence rules and regulations		Response 07	The display of plates is a public safety matter. The Authority respects that there will be certain circumstances where the security/anonymity of the passenger may outweigh that requirement and in those circumstances will exempt a vehicle from displaying plates. Vehicles for the wedding party or for funerals do not need to be licensed and therefore plates do not need to be displayed in those circumstances. However events such as proms are private hire activities and it is considered relevant that licence plates will be displayed for those uses.
	1.5	Why specifically the Chauffeurs Guild?	Livery/clothing MUST be at the discretion of the Client – who may request full livery or lounge suits or casual, depending on their function.		Response 07	The Authority only exempts the display of plates in very specialist circumstances. It is

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			<p>Therefore it is for the Operator in liaison with the hirer at the booking stage to evaluate which is required on a “bespoke” basis. It would also make it more difficult to find quality drivers/chauffeurs as the financial burden of that membership may prohibitive. We are aware that the Chauffeurs Guild can also provide temporary drivers in which case do they also have to be licenced with North Northants</p>			<p>therefore expected that a driver in those circumstances will be of the appropriate standard and the Chauffeurs Guild is recognised as providing that standard. It has been a requirement in the Kettering area for some time. Any person driving a licensed private hire vehicle must be licensed by the same authority that licences the operator and the vehicle..</p> <p>The Authority would recognise a flexibility in dress code with evidence at the time of hiring that this was agreed.</p>
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