

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

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

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

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

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1	Licensing Policy			
	Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
	6.4.1	<p>“Rear loading will only be permitted where a suitable tail lift is in use.”</p> <p>Small WAVs (< 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.

Please use additional lines or a separate sheet if necessary

2 Appendix A

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

Please use additional lines or a separate sheet if necessary				

3	Appendix B			
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	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 rear tailgate of a small WAV’s is often used to load luggage and/or an empty wheelchair / mobility scooter.

Please use additional lines or a separate sheet if necessary

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

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6	Appendix E			
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10	Appendix I			
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11	Appendix J			
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Do you have any other general comments or observations on the Councils Draft Taxi and Private Hire Licensing Policy and Conditions?

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

Please provide the following information:-

Name of respondent [REDACTED]

Representing Organisation (if applicable).....

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

Contact telephone number ... [REDACTED]

Contact e-mail address [REDACTED]

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

Please mark the envelope to Kettering Licensing - Taxis

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	5.12.1 Knowledge Test	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.	
	5. 12.2 Safeguarding training	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.	
	5. 12. 3 Driving assessment practical test	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 needed. This will again place yet another financial strain on existing drivers for something they have already shown competency in	
	5. 12.4 Equality and diversity training	If the council require drivers to undergo this training, 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	
	6.1.1 Vehicle age	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.	
	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.	

Please use additional lines or a separate sheet if necessary

2 Appendix A

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3	Appendix B			
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	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.	

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	16.2	Permanent door signs	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 requirement in your neighbouring council (Northampton) and allows greater flexibility for private hire drivers to use their own car.	

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	6.9.3	Highly unlikely to be able to operate under such outgoings	<p>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.</p> <p>The practicality of an Electric Hackney vehicle and the running costs frighten me and others in the trade may I suggest.</p>	
	6.9.6	Exceptional Condition	<p>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.</p>	
	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 the 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 costs still need to be made.</p> <p>I for one would never put myself or my family under such duress.</p>	

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2 Appendix A

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

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

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

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

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

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1	Licensing Policy			
	Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
	4.1.2	An operator has been advised that the grandfather rights are either 5 years or when the vehicle reaches 10 years old – whichever comes first. Grandfather rights as stated in 4.1.2 are for 5 years from the date this policy is implemented as long as the vehicle has continuously been licenced in that time. So regardless of the vehicle age Grandfather rights will exist for 5 years.		
	4.1.10	The test for drivers for each area I assume is for new drivers only 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.	
	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.		
	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 nd badge?		
	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?		
	5.12.1.12	Why would an existing driver applying for a renewal of licence be required to sit a test? You have already accepted that they are fit and proper to be accepted as a driver. This should be for new drivers only and where existing drivers have had a compliant made against then which warrants a retest. Nothing short of an insult to drivers who have held their badges for years		

		without cause for concern.		
5.12.2.2		Safeguarding Test – all drivers in Wellingborough should have passed this test in early 2020 as we were all requested to attend a course, therefore all drivers should already have this certificate.		
5.12.3.5		Why would an existing driver applying for a renewal of licence be required to sit a test? You have already accepted that they are fit and proper to be accepted as a driver. This should be for new drivers only and where existing drivers have had a complaint 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.		
6.1.1.4		There needs to be a caveat in this section regarding “grandfather rights” of existing vehicles. The council should consider the maximum age of vehicles as buying a vehicle potentially every 10 years would have a huge impact on a business – especially small businesses. A suggestion would be a maximum of 12 years and after 10 years an additional test is carried out on the vehicle. A second suggestion would be that some councils have adopted is that where vehicles are hybrid or Euro 6 diesels these are accepted for a longer maximum period as they are already vehicles with better emissions.	The cheapest 8 seater vehicle brand new – euro 6 is £35000 – if you then added interest at 6% over 5 years you’d add another £10,500 approx to the cost of the vehicle – making it £46500 which is a huge investment for any business and if a business is expected to change a vehicle every 10 years it would no longer be viable. Looking at the main players of new taxis as at today none of the companies are offering full electric 8 seaters either. They are only offering hybrids at a cost of around £43 to £47,000 – again a huge investment which small companies cannot sustain every 10 years.	
6.2.7 and 6.2.9		You state in 6.2.7 that MPV vehicles are allowed allowing 4-8 passengers. Yet in 6.2.9 you state that seating in PH vehicles must be permanent, not be folded away and a clear route out of the vehicle. The 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. 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	The majority of 6 to 8 passenger vehicles are all forward facing seats – therefore to get into the back row you need to flip a seat. If these are not allowed then you eliminate a vast selection of vehicles from being used as taxis, all of which are manufactured in this way and are safe for passengers. The only alternative is a 9 seater conference seating configuration at a cost of over £45000 brand new which would see many individuals and small businesses not being able to afford and put out of business. Most passengers travelling to airports also prefer forward facing seats and not travelling in a backward position. There is no justification for not allowing manufactured purpose built MPV’s with fold down seats.	

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

Please use additional lines or a separate sheet if necessary				
2	Appendix A			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	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		

Please use additional lines or a separate sheet if necessary				

3	Appendix B			
Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)	
9.1	Any passengers under the age of 13? What if the passengers are part of a school contract and all passengers apart from the passenger assistant who has to sit in the back are all under the age of 13 years old. There needs to be a caveat to this showing this exception.			
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.			

Please use additional lines or a separate sheet if necessary

4	Appendix C			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	15.1	Plates on front of the vehicle. On most vehicles the only place to fix the plate correctly is by the grill. However this may cause issues as the air to the grill is blocked which in turn can cause mechanical problems. There needs to be a solution as to the best place where this can be placed without damaging the vehicle.		
	App B 13.1 App C 24.2	Lost property – one says to give to Police after 24 hours / other says licensing Team – surely, they should be the same?		

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary				

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

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

Please use additional lines or a separate sheet if necessary				

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

Please use additional lines or a separate sheet if necessary

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

	Number			

Please use additional lines or a separate sheet if necessary

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

	Please continue on a separate sheet if necessary
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Please provide the following information:-

Name of respondent [redacted]

Representing Organisation (if applicable)... [redacted]

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

Contact telephone number [redacted]

Contact e-mail address [redacted]

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

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

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

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

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

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

Please mark the envelope to Kettering Licensing - Taxis

If you require this document or any related consultation documents in any other format, please contact:
licensing.BCW@northnorthants.gov.uk or
Telephone: 01933 231966

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

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

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

Please use additional lines or a separate sheet if necessary

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

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

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

Annual cost to purchase and insure £15,996

Breakdown of working days

52 weeks @5 days= 260

Statutory public holidays = 8

20 days annual holidays as per government guidelines

Approx. 10 days to include vehicle tests & maintenance

Total working days 222 days

Required earnings to cover vehicle purchase and insurance

£15,996 / 222 days = £72.05 per day

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

Do you think you could manage?

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

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

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

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

I would also like to Note:

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

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Representing Organisation (if applicable).....

North Northamptonshire Council Licence holder? **YES**/NO If Yes please state licence number [REDACTED]

Contact telephone number ... [REDACTED]

Contact e-mail address [REDACTED]

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North Northamptonshire Council,
Sheerness House,
41 Meadow Road,
Kettering,
NN16 8TL.

Please mark the envelope to Kettering Licensing - Taxis

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licensing.BCW@northnorthants.gov.uk or

Telephone: 01933 231966

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1	Licensing Policy			
	Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
	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	
	3.2	Setting standards is essential and long overdue in the interest of safeguarding their passengers/clients, and should be 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	Without this duty of care and safety standards may be compromised	
	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.	
	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	
	6.1.1.1	Purchase of a specialist vehicle e.g. Stretched	Again we would refer to “classic/specialist genre” (as	

		Limousine or Classic Car/Vehicle may (and with classic cars – does) mean that it is more than 4 years old.	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.	
6.1.2.4		Operators will need as a matter of urgency, clarification on reference to a Class 6 MOT for Stretched Limousines	We are unable to find any reference to a “Class 6 MOT” It is important to note that at the present time Stretched Limousines undertake their MOTs as a Class 4 which allows for vehicles carrying up to 8 passengers.	DVLA Website used as point of reference/evidence
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
6.2.7		It would appear that no reference has been made or is given to Stretched Limousines	Stretched Limousines carrying 8 passengers MAXIMUM plus the driver; this section appears to have been overlooked	
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.	
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’.	

6.2.16	<p>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.</p>	<p>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 :</p> <ol style="list-style-type: none"> 1. LPG 2. Emissions <ul style="list-style-type: none"> • From 1.4.2025 – no mention has been made relating to synthetic fuels which are presently being designed and developed to significantly reduce emissions. • Such fuels are being developed by companies such as Shell, McLaren & Porsche plus others and thus for Licencing Policy purposes more than justify investigation on a local level. • At this point in time, there is not available an electric/hydrogen stretched limousine! • 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. • 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. • 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 	<p>As operated by Vista Limousines & Events V885 EPN Lincoln Town Car Stretched Limousine</p> <p>For illustration Shell offer such a scheme as does Federation of British Historic Vehicle Clubs:</p>
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			<p>to the Operator!</p> <ul style="list-style-type: none"> • We must therefore ask the question - will exceptions be made for “Exceptional Age Vehicles?” • 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 • 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 <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>	
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 making planning very difficult for the Operators and possibly the Test Centres.

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	
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.
6.9.10	Judging the merits of the condition of the vehicle	Who makes that judgement and based on what knowledge base/qualification?	
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!	
8.1.5.		This can also easily be proven by the VIN	
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	
8.1.8	Inspection by Authorised Officer of the Council	Who makes that judgement and based on what knowledge base/qualification?	
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.	

	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 it.	
	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
	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 Licencing Authorities.</p>	

Please use additional lines or a separate sheet if necessary

2	Appendix A			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	Table 1	<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>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</p>	<p>Specific reference is offered by virtue of this Operators direct experience with a highly qualified applicant during 2022.</p>

			<p>trust and confidence in being driven safely.</p> <p>We do feel, however, that a 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.</p>	
<p>Please use additional lines or a separate sheet if necessary</p>				

3	Appendix B			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	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.	
Please use additional lines or a separate sheet if necessary				

4	Appendix C			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	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.	
	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 be policed and monitored during the routine Council test	To meet the requirements of 11.3	
	17.0	Full clarification and reasoning of this point in respectfully requested		
Please use additional lines or a separate sheet if necessary				

5	Appendix D			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
Please use additional lines or a separate sheet if necessary				

6	Appendix E			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	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.	
	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.	
	9.5	Full clarification point referring to “10.4 above” is respectfully requested	Does it refer to another appendix?	
Please use additional lines or a separate sheet if necessary				

7	Appendix F			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	2.4	We would reiterate that a vehicle over 10 years of age is exempt from an IVA	As previously noted	DVLA website
	2.5		As previously covered	
	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.	
Please use additional lines or a separate sheet if necessary				

8	Appendix G			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
Please use additional lines or a separate sheet if necessary				

9	Appendix H			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
Please use additional lines or a separate sheet if necessary				

10	Appendix I			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	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	
	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. 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	
Please use additional lines or a separate sheet if necessary				

11	Appendix J			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
Please use additional lines or a separate sheet if necessary				

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

In no particular order of priority we would comment as below :

1. It is overdue for ALL licencing to be generic to the whole of England
2. It is overdue for each Hire category to be clearly identified separately i.e.
 - Private Hire
 - Hackney Carriage
 - Executive Hire
 - Chauffeured Hire

for greater clarity to the Operators, even though much of the policy will be common to all 4 area

3. Licencing for all English Licencing Authorities need to be the same for each Council as there is clearly disparity between many in basic areas e.g. medicals – in one Council area we find a one page document required and in the adjoining Council area a 6 page document is required!!
4. With all due respect to Council Officers, Private Hire and Hackney Carriages need to be overseen within each Licencing Authority by an individual with a good comprehension of :
 - Vehicles, including specialist vehicles
 - DVLA Regulations
 - Technical elements i.e. fuels, vehicle engines, emissions, technological advances
 - Comprehensive understanding (and ideally experience) of running a Private Hire business or similar
 - Regular liaison and collaboration (where appropriate) with industry associations e.g. LPHCA | The Licensed Private Hire Car Association <https://lphca.co.uk> and/or <https://www.thenlca.co.uk>
 - National Limousine and Chauffeurs Association dealing directly with operators regulated according to UK Transport Law
5. It would be appreciated if consultations between Licencing Authorities and Operators for the purpose of policy discussions regarding the fast changing technological issues around emissions, fuels etc., autonomous vehicles and the financial implications and ramifications and burdens on Licenced Operator/Drivers could be arranged

6. It would be appreciated if ALL Councils Rules & Regulations thereby making it easier to sub-contract into a different area by virtue of ALL Licencing Rules & Regulations being the same. This may facilitate locally Licenced Drivers being able to work in other areas e.g. A North Northamptonshire Driver could take work in for example Oxford without having an Oxford Licence, simply because he would be operating within an identical set of Rules.
7. To achieve this the Driver would be required to purchase the Licence specifically in the area in which he resides (thereby not affecting the Council's income), but still be able to undertake work for a Licenced Operator within another area/s.
8. We feel it is important that a named spouse or partner should be allowed to drive a vehicle which is under his or her partners Private Hire Licence Number to alleviate the financial burden of having to purchase a second car for the family for such basic drives as shopping, school runs etc. (but obviously they could not use it for Private Hire assignments.)
9. We feel that this document should be considered the foundation for a National Industry Sector Standard, but it is very apparent within the Consultation document itself, that no mention has been made of Limousine Hire BROKERS!
 - So, how are these "policed" by the Licencing Authority (whose rules and regulations applied to the rest of us) in terms of checking that they are meeting all the rules and regulations of their local Licencing Authority?
 - There is at least one Limousine operator in the Wellingborough area that does not appear on the Council Register and MAY be utilising limousines that are not licenced with any Authority.
 - Also as a "bonifide" address is given in the area and on its website (Google shows this as a field in a lane in Wollaston!) and is also shown on Yell.com and Google!! As it is advertising specific event services including Proms etc., should this company not have an Operators Licence and adhere to the Authority Rules as applied to other Operators in the Area. It is also important to note that they are using an 0800 telephone number which could be anywhere in the country.
 - We believe this to be a National issue regarding Limousine Brokers per say.

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

Please provide the following information:-

Name of respondent [REDACTED]

Representing Organisation (if applicable) **MANAGING DIRECTOR, VISTA LIMOUSINES & EVENTS LTD**

North Northamptonshire Council Licence holder? YES

If Yes please state licence number [REDACTED]

Contact telephone number [REDACTED]

Contact e-mail address [REDACTED]

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

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

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

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

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

Please mark the envelope to Kettering Licensing - Taxis

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

If you require this document or any related consultation documents in any other format, please contact:
licensing.BCW@northnorthants.gov.uk or
Telephone: 01933 231966

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

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

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

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

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

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

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

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

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

5.12.2.2	Safeguarding Test – all drivers in Wellingborough should have passed this test in early 2020 as we were all requested to attend a course, therefore all drivers should already have this certificate.		
5.12.3.5	Why would an existing driver applying for a renewal of licence be required to sit a test? You have already accepted that they are fit and proper to be accepted as a driver. This should be for new drivers only and where existing drivers have had a compliant made against then which warrants a retest. Nothing short of an insult to drivers who have held their badges for years, along with extra costs incurred.	Loss of drivers who can earn more elsewhere, difficult to recruit.	
6.1.1.4	There needs to be a caveat in this section regarding “grandfather rights” of existing vehicles. The council should consider the maximum age of vehicles as buying a vehicle potentially every 10 years would have a huge impact on a business – especially small businesses. A suggestion would be a maximum of 12 years and after 10 years an additional test is carried out on the vehicle. A second suggestion would be that some councils have adopted is that where vehicles are hybrid or Euro 6 diesels these are accepted for a longer maximum period as they are already vehicles with better emissions.	The cheapest 8 seater vehicle brand new – euro 6 is £35000 – if you then added interest at 6% over 5 years you’d add another £10,500 approx to the cost of the vehicle – making it £46500 which is a huge investment for any business and if a business is expected to change a vehicle every 10 years it would no longer be viable. Looking at the main players of new taxis as at today none of the companies are offering full electric 8 seaters either. They are only offering hybrids at a cost of around £43 to £47,000 – again a huge investment which small companies cannot sustain every 10 years.	
6.2.7 and 6.2.9	You state in 6.2.7 that MPV vehicles are allowed allowing 4-8 passengers. Yet in 6.2.9 you state that seating in PH vehicles must be permanent, not be folded away and a clear route out of the vehicle.	The majority of 6 to 8 passenger vehicles are all forward facing seats – therefore to get into the back row you need to flip a seat. If these are not allowed then you eliminate a vast selection of vehicles from being used as taxis, all of which are manufactured in this way and are safe for passengers. The only alternative is a 9 seater conference seating configuration at a cost of over £45000 brand new which would see many individuals and small businesses not being able to afford and put out of business. Most passengers travelling to airports also prefer forward facing seats and not travelling in a backward position. There is no justification for not allowing manufactured purpose built MPV’s with fold down seats.	
6.2.16	April 2025 new vehicles either hybrid or fully electric. Following on from the above point on	According to Zap map there are only 7 charging areas currently in Wellingborough covering the whole borough	

		<p>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>and 42000 across the uk. According to EV-Charger by 2030 there needs to be 2.3 million charging points in the UK – which is 700 new installs every day by 2030. Yet the government has only advised there will be 300,000 by 2030 – which is an extra 258000 in th UK over today's current figure, which by the same percentage as above gives WB an extra 42 charging points for the whole borough.</p> <p>The infrastructure will be totally insufficient as at 2030 to allow potentially up to 200 taxis to charge their vehicles alongside the general public. The infrastructure needs to be in place before you dictate by 2030 we all need to have either fully electric or hybrid vehicles.</p> <p>The cost of installing electric points at home/work premises is between £800 and £1100 – again a cost that we take the brunt off. If an operator has a fleet of say 5 cars that's up to £5500.00 further investment on top of the cost of the vehicles.</p> <p>I would suggest that Euro 6 vehicles and current hybrid vehicles are allowed to continue past 2030 / 10 year rule to allow more time for a more concrete infrastructure.</p>	
6.4.4		This is for new drivers and new vehicles??		
6.5.1		Renewals 6 weeks in advance as 28-day turnaround? Tests on vehicles cannot be done until the 1 st day of the month the vehicle expires (so we have been told) – so a vehicle expiring on 31 st July cannot go in for its council test at the earliest the 1 st 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?		

Please use additional lines or a separate sheet if necessary

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary				

6	Appendix E			
	Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
	11.3	This needs to be relayed to School contracts at West Northants and North Northants as they expect 6 and 8 seaters to be fully loaded with passengers. If all junior school age then they can't do this. If it only applies to certain sized vehicles than it needs to be made clear what vehicles.		

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

	Number			

Please use additional lines or a separate sheet if necessary

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

	Reference Number			applicable)
Please use additional lines or a separate sheet if necessary				

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

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

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

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

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

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

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

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

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

Please continue on a separate sheet if necessary

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Please provide the following information:-

Name of respondent [REDACTED]

Representing Organisation (if applicable)...Phoenix Cars.....

North Northamptonshire Council Licence holder? YES/NO If Yes please state licence number ... [REDACTED]

Contact telephone number [REDACTED]

Contact e-mail address [REDACTED]

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

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

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

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

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

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

Please mark the envelope to Kettering Licensing - Taxis

If you require this document or any related consultation documents in any other format, please contact:
licensing.BCW@northnorthants.gov.uk or
Telephone: 01933 231966

Email received 27/07/22 – 14:41

This is my response to the consultation process

Listed below are responses to individual Policy proposals. My overall honest opinion is that you will not have a sufficient number of Hackney or Private drivers within two years, by all accounts the Country is already short. I understand the Council making policies to ensure public safety, but by overkill, you are making the situation worse... What happens to the young girls who cannot get home on a weekend night out due to a shortage of drivers?? New applicants will not go simply not bother, a Driving test alone, Advance at that! Seriously, you cannot book a normal driving test at present let alone an Advanced test, and you're expecting new applicants and existing drivers to take one.

5.6.6 DBS... 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

[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

[5.12.3.5](#) 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 at least one observatory lesson before issuing a license??

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

[6.1.1.1](#) Vehicle Age... 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?

6.2.16 Electric Vehicles... I am dead against this proposal, it's a nonsense, far too early to 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?

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 unprofesional, 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

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

That's it, I could have written more, but I thought it was July 31st it ended, my mistake so I have listed what I think is important, not only for myself but as a trade moving forward. I haven't even mentioned the safeguard and diversity training also part of your license renewal or application. surely these could be rolled into half a day and attended at the same time? More bureaucracy that is overload, I am not saying we shouldn't be aware and yes maybe attend a seminar, but tests, really?

As already stated and I keep every email I send, yes everyone. If you go ahead and don't listen, mark my words there will be a major shortage of drivers within two years, if not before. I know many of the independent drivers running around Rushden who will not renew. They are so popular because the main companies are so bad. So please at least take some of my points on board after all I have been in the business since January 1991

Regards

██████████

East Northants ██████████

5 Appendix D

Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
15.1	Front Plate	Blocking Air vents and blocks various sensors.	Manufacture
2.2	Need Saloon Hackney	Need saloon for elderly passengers.	
6.1.1	vehicle age	Expensive to buy 4 years old car	

Please use additional lines or a separate sheet if necessary

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

Allow Saloon Hackney carriage vehicles for elderly passengers.
Allow 6 seater vehicles like vauxhall zahira because
purpose built vehicles are very expensive for me to buy.

Please continue on a separate sheet if necessary

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Contact telephone number [REDACTED]

Contact e-mail address [REDACTED]



North
Northamptonshire
Council

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

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

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

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

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

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

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

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

1	Licensing Policy			
	Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
	1.0.4	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.	
	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?	
	5.12.1.1 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?	
	6.1.1.1 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?	
	6.1.1.4	Licensed 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?	
	6.1.2.3	Two MOTs and Council tests annually.	Why two MOTs ?	

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?	
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.	
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)?	
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.	
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.	

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Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary				

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary

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

Please use additional lines or a separate sheet if necessary				

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

Please use additional lines or a separate sheet if necessary				

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

Please use additional lines or a separate sheet if necessary				

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

Please use additional lines or a separate sheet if necessary

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

While the new proposed Hackney regulations will be welcomed from the Green Lobby, they are light years away from reality. The costs involved to the operators will undoubtedly have to be passed on to the public. In this present climate of high inflation, shortages of household commodities and soaring energy costs, these unnecessary policy changes must be nonstarter.

Why should the Council introduce green policies only for Hackney Carriages, when the government are not making similar policies for car owners (that far outnumber taxis)?

Hackney Carriages and buses are the main form of public transport in Corby – surely the operating policies should mirror each other? At present most of the buses in general service in Corby are 15–20 years old and school buses are often in excess of 20 years old. All of these buses are over Euro4 emissions, never mind Euro6.

As mentioned previously, I think the Corby Hackney Carriage trade is being unfairly persecuted.

Please continue on a separate sheet if necessary

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Representing Organisation (if applicable).....N/a.....

North Northamptonshire Council Licence holder? YES/NO If Yes please state licence number [REDACTED]

Contact telephone number ... [REDACTED]

Contact e-mail address [REDACTED]

If you require this document or any related consultation

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

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

documents in any other format, please contact:
licensing.BCW@northnorthants.gov.uk or

Telephone: 01933 231966

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

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

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

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

Please mark the envelope to Kettering Licensing - Taxis

Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
6-1-1-1	Hackney carriage private hire vehicle age.	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 feasible	
6.29	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 individual 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 got a quote from	

Please use additional lines or a separate sheet if necessary

Page 5 of 14

cab direct which was £100,000 including interest.

continued.

Appendix c

15.1 NNC identification plate.

Ventilation system at the front of the vehicle. This is where you have proposed to place another identification plate. Having this plate covering essential safety feature of the car is dangerous, risking the lives of drivers and passengers. If anything were to happen to the car, eg - vehicle catches fire, who is liable?

What is the need to have multiple identification plates?

Reference to Evidence -
Manufacturers guide

5 Appendix D

Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
2.2	Saloon Hackney carriage vehicles.	Elderly customers prefer Saloon vehicles due to easier access. Person operation Taxi services needs to be able to meet individual needs of customers, this can be achieved with a mix fleet.	
15.1	NNC front plate	Having a front plate covering and blocking safety features ventilation ~ vehicle may catch fire.	vehicle manufacturer's guide.

Please use additional lines or a separate sheet if necessary

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

I would recommend you amend your proposal to stop diesel and petrol only vehicles by 2030 to 2035. The government is stopping new sales of diesel and petrol only vehicle in 2030. This will allow a few year for drivers to buy electric vehicles which are second hand. It is very unlikely that a person whos income is that of a taxi vehicle driver can afford brand new cars/vehicles, this will likely result in many leaving this profession and looking for alternate employment

Please continue on a separate sheet if necessary

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Telephone: 01933 231966

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

I would like that you extend the Licencing
of Diesel only, Petrol only vehicle beyond 2030
The Likely impact will be people finding different
Professions, as they will not be able to afford
these vehicle specially 4 years or newer.

Please continue on a separate sheet if necessary

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Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
6.1.1.1	Private Hire Vehicles Hackney carriage vehicle age	Drivers cannot afford 5 year old vehicles, and you are proposing 4 years.	
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 seats vehicles. Drivers cannot afford purpose built vehicles	
Please use additional lines or a separate sheet if necessary			

Please turn Page.

Appendix C

15.1. Identification Plate

Having a front Plate
is a very Bad idea as
this will result in Blocking
Safety features of modern
Vehicles, such as
Optical Parking Sensor,
Front Parking Camera
Front Radar sensor
Front adaptive cruise.

Furthermore it will
Impact the vehicles
Ventilation System by
-Blocking airflow to
Cool the vehicle. Blocking
will cause vehicle to
Catch fire, Will NNC
take responsibility for
Damages.

Section Reference Number	Comment	Likely Impact or Justification	Reference to Evidence (if applicable)
2.2	Saloon Hackney Carriage Vehicles	Need mixed fleet to cater to all	
15.1	NMC front Vehicle Identification Plate	Blocking Sensors Blocking Ventilation System, Will over heat vehicle and Will cause vehicle fire.	

Please use additional lines or a separate sheet if necessary

Licensing Policy

Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
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 there will be only one zone consisting of the 4 sovereign areas. Which is true?	
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.	

use additional lines or a separate sheet if necessary

Continued

Licensing Policy

Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
5-13-1	10 Year End of Vehicle rule	Assuming this is implemented in late 2022 17 of the 33 H/c in Wellingborough will be taken off. 2 of these are WAV, leaving only 2 WAVs. A year later another 4 H/c will need to retire. Therefore 21 of the 33 H/c will not be licensed. Drivers/Operators are unable to afford replacement vehicles with trade as it is,	

use additional lines or a separate sheet if necessary

Continued

Licensing Policy

Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
S-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 H/c in Wellingborough in the future.	
6.1.14	Lack of Wellingborough Hackneys	If this is implemented in 2022 Wellingborough will lose 17 h/c out of its fleet of 33 with another 4 leaving a year later. With an average of 2 fares per hour drivers will need to leave the trade due to the cost of new taxis	

use additional lines or a separate sheet if necessary

Licensing Policy

Section Reference Number	Comment on Policy Section	Likely Impact or Justification For Comment	Reference to Evidence (if applicable)
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 knell for taxis in Wellingborough.	

use additional lines or a separate sheet if necessary

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

Regarding Front MOGO identification plates and brackets
Have the Council satisfied themselves that potentially these could cause more harm to a pedestrian if shattered in a forward accident due to the brittleness.
Have these fittings passed an anthropomorphic test device as car manufacturers spend time designing a vehicle so as to minimise harm to a vulnerable road user. Adding a brittle piece of plastic?

Please continue on a separate sheet if necessary

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