

Licensing and Appeals Committee 04 March 2024

Report Title	Hackney Carriage De-zoning
Report Author	Iain Smith Assistant Director of Regulatory Services iain.smith@northnorthants.gov.uk

1. Purpose of Report

- 1.1 To seek a recommendation to the Executive in respect of potentially removing the hackney carriage zones in North Northamptonshire following a consultation process.

2. Executive Summary

- 2.1 Following vesting day on 1st April 2021, while private hire vehicle licensing reflected the new unitary arrangements, historical legislation meant that hackney carriage licensing continued to operate in line with the pre-unitary authority areas.
- 2.2 A report was put before the Executive on 14th September 2023 recommending that a consultation be carried out on removing the hackney carriage zones in North Northamptonshire.
- 2.3 A consultation process was undertaken between 30th October 2023 and 21st January 2024.
- 2.4 The purpose of this report is to present the consultation findings and seek recommendations to the Executive as to the next course of action.

3. Recommendations

- 3.1 The committee is recommended:
- a. to consider the report and consultation responses;
 - b. to make a proposal to the Executive on whether the current four hackney carriage zones should be replaced with one North Northamptonshire Council (NNC) zone;
 - c. to make a proposal to the Executive on whether the current Hackney Carriage Byelaws should be reviewed

- 3.2 Reason for Recommendations in relation to the zones - following the alignment of the hackney carriage tariff of fares and implementation of one Hackney Carriage and Private Hire Policy covering the whole of NNC's area, the retention of four separate zones for hackney carriage licencing needs further consideration. The report sets out the responses received to the recent consultation and requests a decision on whether the Executive should be recommended to review the zones.
- 3.3 Reason for Recommendations in relation to the byelaws - the review of the zones necessitates a review of the byelaws which govern hackney carriage licencing.
- 3.3 Alternative Options Considered in relation to the zones - the committee could recommend that the Executive;
- i) Takes no action and retains the current four hackney carriage zones.
 - ii) Determines that the zones should be removed and the process required to implement this decision immediately begins
 - iii) Determines that the zones should be removed, but that there should be a delayed implementation date.
- 3.4 Alternative Option Considered in relation to the byelaws - the committee could recommend that the Executive;
- i) Takes no action and retains the current Hackney Carriage Byelaws.

4. Report Background

- 4.1 Following vesting day on 1st April 2021, while private hire vehicle licensing reflected the new unitary arrangements, historical legislation meant that hackney carriage licensing continued to operate in line with the pre-unitary authority areas.
- 4.2 On 3rd July 2023 a report was put before the Licensing and Appeals Committee to consider whether there was a desire to review the existing zone arrangements, alongside a proposal to review the hackney carriage byelaws.
- 4.3 The committee resolved to recommend to the Executive:
- (i) that a consultation process be undertaken on the potential removal of the current four hackney carriage zones and replacement with one North Northamptonshire Council (NNC) zone;
 - (ii) that the current Hackney Carriage Byelaws be reviewed.
- 4.4 The matter was considered by the Sustainable and Prosperous Executive Advisory Panels jointly on 9th August 2023 prior to the Executive meeting. It was resolved that the proposal to undertake a consultation process on the potential removal of the Hackney Carriage Zones and Hackney Carriage Byelaws, be recommended to the Executive for a decision.
- 4.5 At its meeting on 14th September 2023 the Executive :

- i) Approved commencement of a consultation process on the potential removal of the current four hackney carriage zones and replacement with one NNC zone;
- ii) Approved that the current Hackney Carriage Byelaws are reviewed.

4.6 Between 30th October 2023 and 21st January 2024 a consultation on the proposal to remove the hackney carriage zones in North Northamptonshire was carried out. The consultation was on the North Northamptonshire Council Website during this period and media releases were sent out. All hackney carriage proprietors and driver licence holders were directly emailed at the commencement of the consultation and prior to the closure of the consultation.

5. Issues and Choices

5.1 Senior officers from Regulatory Services met with trade representatives at meetings in Corby and Wellingborough. During the meeting with representatives from the Corby trade on 2nd January 2024, the following key points were raised by the trade;

- It was stated that the current policy requirement that vehicles must be no older than four years from the first day of registration on initial application to the council, is resulting in significant financial challenges which are making the trade un-viable. Although this comment relates to the policy, rather than the decision over whether zones should be removed, it was considered that the two issues are related.
- The removal of zones would mean that saloon hackney carriage vehicles licensed by the council (due to them holding grandfather rights under the policy) would be permitted to use the ranks in Corby. Since there are no licensed saloon hackney carriage vehicles within the Corby zone, it was considered that this would reduce the standard of service within the Corby zone and increase the number of non-accessible vehicles plying for hire within Corby.
- Increasing the geographical size of the zone by forming one new North Northamptonshire zone, would result in licensed drivers using the ranks who lack geographical knowledge of the area. This would reduce service provision for customers who may not be transported via the shortest route available. It was claimed that this also creates a safety issue, since vulnerable passengers are reliant upon the driver knowing the area. It was claimed that this could result in chaos and confusion.
- It is believed that removing the zones would increase the number of licensed hackney carriage vehicles in Corby town centre, resulting in congestion on George Street.
- It was stated that Corby has more cabs per capita than any other town within North Northants and there is no significant unmet demand. It was stated that other areas do not have the same number of taxi's available and they have an unmet demand. It was acknowledged that there has been no unmet demand survey in the other towns.

5.2 During the meeting with representatives from the East and Wellingborough trade on 3rd January 2024, the following key points were raised by the trade;

- Concerns were raised in relation to policy requirements for hackney carriage vehicles to be wheelchair accessible and for vehicles to be no older than four years from the first day of registration on initial application. It was claimed that this is adversely impacting the trade. This comment relates to policy requirement concerns rather than the decision over whether zones should be removed, however given the impact upon the trade it was considered that the issue was still relevant.
- It was stated that by de-zoning the council would be ‘moving the goalposts’, since the policy provided 5year grandfather rights for existing licensed vehicles to continue to be used. It was therefore felt that no further significant change should be made which may further impact the trade within this time period.
- Representatives felt that drivers would move to where the work is, so there will be a shortage of vehicles available for hire in certain areas, impacting customers within those towns.
- It was stated that drivers are using different fares across the four zones and allowing drivers to ply for hire across the whole North Northamptonshire area would create variations in the fare charged, resulting in conflict for drivers.
- There was a concern that the knowledge test may be too difficult, due to the need for it to cover the whole of the North Northamptonshire area. This may result in a number of drivers being unable to pass the test, which would reduce the number of hackney carriage vehicles available for hire, which would be detrimental to the public.
- There was a feeling that the trade wanted to continue to serve the same community they have always served and de-zoning would reduce the number of vehicles available for them to service their existing customer base, meaning a reduced service.
- Creating one new North Northamptonshire zone would result in drivers not having a good knowledge of the area, which would mean that they could inadvertently fall foul of legislation by not using the quickest route, which could result in enforcement action being taken against them.

5.3 There was no request for a meeting from hackney carriage proprietors or drivers currently working in the Kettering zone.

5.4 The responses received during the consultation period are included at Appendix A. There were 35 responses, all from the trade and the inclusions in Appendix A are direct copies of the email representations received. 33 of the responses were against the potential removal of the zones and 2 were in favour.

5.5 If the decision is taken to introduce one hackney carriage zone for North Northamptonshire, then the Authority has already identified that a new set of byelaws will be required for the area and it will be necessary to complete both central and local government processes to achieve this. This will need to be aligned with the introduction of the new zone.

5.6 If the decision is taken to continue with the existing zones then it will still be necessary to introduce new byelaws for the 4 zones as the current sets are old and outdated. The department for Transport issued a new set of model byelaws for local authorities to adopt in November 2023. The model byelaws could be introduced separately in each of the four zones to ensure commonality of approach.

6. Next Steps

- 6.1 Once the committee has considered the matter and made its recommendation, it is planned to take a report to the Place and Economy Environment Scrutiny committee on 30th April 2024.
- 6.2 A report is to be taken to the Executive for approval on 6th June 2024. If the Executive determine that the zones should be removed, officers will formulate an implementation plan to ensure that the required processes are in place before implementation.
- 6.3 The decision will determine if 4 new sets of model byelaws are required or one for the whole of North Northamptonshire. Beyond this point the process will be the same. The proposed byelaws will need to be agreed. A new set of model byelaws were introduced by DfT in November 2023 which may be adopted as the new byelaws.
- 6.4 Once the draft new byelaws are agreed they will need to be approved by the Secretary of State for Transport and a date of introduction agreed. The new model byelaws contain a revocation byelaw to deal with existing bye laws.

7. Implications (including financial implications)

7.1 Resources, Financial and Transformation

- 7.1.1 The removal of the four local zones will remove the requirements for unmet demand surveys for hackney carriages in the Corby area, removing the need to pass the costs onto the trade. This will also remove the number of hackney carriage vehicle licence currently identified as being the number sufficient to meet demand.
- 7.1.2 There is concern that if the zones are removed this will leave some of the smaller towns with a reduced number of Hackney Carriage vehicles available for hire, due to the drivers moving to the towns where there is more work. This would have a negative impact upon service provision in these areas. The extent to which the trade will change the way that they operate and how long it would take for the market to even out is unknown.
- 7.1.3 It is anticipated that over time the existing taxi trade and new businesses entering the market will develop to meet the opportunities that a decision to remove zones might offer. With one licence being required for a driver and for a vehicle to operate across North Northamptonshire rather than the current four, one for each zone the option for area wide operations is available. As a result it will be necessary to review current taxi rank availability both in terms of locations and capacity to ensure that customer service requirements continue to be met.
- 7.1.4 New application processes will need to be developed to meet the requirements of the new area including a new “knowledge test” to reflect the modern demands on taxi drivers in North Northamptonshire.

7.2 Legal and Governance

7.2.1 Should the Authority wish to remove hackney carriage zones from its area then there is a legal process to follow. This process is laid out in Schedule 14 to the Local Government Act 1972, Part II, para 25, detailed below.

25 (1) Subject to sub-paragraph (2) below, a local authority may after giving the requisite notice resolve that any of the enactments mentioned in paragraph 24 above shall apply throughout their area or shall cease to apply throughout their area (whether or not, in either case, the enactment applies only to part of their area).

(2) A resolution under this paragraph disapplying—

(a) section 171(4) of the Public Health Act 1875;

(b)

(c) section 82, 83 of the Public Health Acts Amendment Act 1907; or

(d) section 76 of the Public Health Act 1925;

must be passed before 1st April 1975, but any other resolution under this paragraph may be passed at any time.

(3) A resolution under this paragraph applying either of the following provisions, that is to say, section 21 of the said Act of 1907 or section 18 of the said Act of 1925, throughout an area shall have effect as a resolution disapplying the other provision throughout that area and a resolution under this paragraph applying either of the following provisions, that is to say, the original street-naming enactment or section 19 of the said Act of 1925, throughout an area shall have effect as a resolution disapplying the other provision throughout that area.

(4)

(5) The notice which is requisite for a resolution given under sub-paragraph (1) above is a notice—

(a) given by the local authority in question of their intention to pass the resolution given by advertisement in two consecutive weeks in a local newspaper circulating in their area; and

(b) served, not later than the date on which the advertisement is first published, on the council of every parish or community whose area, or part of whose area, is affected by the resolution or, in the case of a parish so affected but not having a parish council (whether separate or common), on the chairman of the parish meeting.

(6) The date on which a resolution under this paragraph is to take effect shall—

(a) be a date specified therein, being not earlier than one month after the date of the resolution; .

(b)

(7) A copy of a resolution of a local authority under this paragraph, certified in writing to be a true copy by the proper officer of the authority, shall in all legal proceedings be received as evidence of the resolution having been passed by the authority.

7.2.2 Previously approval for a resolution under this Section required the approval of the Secretary of State but this was removed by a Legislative Reform Order and therefore, provided the above process is followed, the Authority can remove its Hackney Carriage zones.

7.2.3 Should the Authority wish to introduce a byelaw or byelaws which deviate from the model ones, the DfT expects the Authority to take a rigorous approach in drafting to ensure that the tests of legal validity are met. These are set out in *Kruse v Johnson* [1898 2 QB 91] as comprising four elements essential to validity:

- byelaws must be within the powers of the local authority which makes them;
- byelaws must not be repugnant to the general law;
- byelaws must be certain and positive in their terms; and
- byelaws must be reasonable.

7.2.4 If a local authority identifies a policy objective which it wishes to reflect in byelaws, the onus will be on the local authority to draft a suitable byelaw to put to the Department for provisional approval. The onus will also be on the local authority to satisfy itself as to the validity of any proposed byelaw which it submits to the Department for approval. It is expected that the Authority will have sought their own legal advice and to provide an explanation as to why they consider that any proposed byelaw is valid.

7.2.5 Confirmation by the Secretary of State does not endow the byelaws with legal validity - only the courts can determine whether a byelaw is valid. To this extent, it is crucial that any draft byelaws are seen and approved by the Council's legal advisers. Any request for provisional approval of byelaws which deviate from the model should be accompanied by an explanation of the policy objective, a justification of their validity and confirmation that the byelaws have been approved by legal advisers.

7.2.6 Should the Authority decide to implement new byelaws, there is a need to follow the process laid down in Section 236 of the Local Government Act 1972 for the adoption of byelaws:

(1) Subject to subsection (2) below, the following provisions of this section shall apply to byelaws to be made by a local authority in England under this Act and to byelaws made by a local authority in England, the Greater London Authority, Transport for London, an Integrated Transport Authority for an integrated transport area in England or a combined authority under any other enactment and conferring on the authority a power to make byelaws and for which specific provision is not otherwise made.

(2) This section shall not apply to
(a) byelaws of a class prescribed by regulations under section 236A, or
(b) byelaws made by the Civil Aviation Authority under section 29 of the Civil Aviation Act 1982.

(3) Subject to subsection (3A) below, the byelaws shall be made under the common seal of the authority, or, in the case of byelaws made by a parish council not having a seal, under the hands and seals of two members of the council, and shall not have effect until they are confirmed by the confirming authority.

(3A) Byelaws made by the Greater London Authority shall be made under the hand of the Mayor and shall not have effect until they are confirmed by the confirming authority.

(4) At least one month before application for confirmation of the byelaws is made, notice of the intention to apply for confirmation shall be given in one or more local newspapers circulating in the area to which the byelaws are to apply.

(5) For at least one month before application for confirmation is made, a copy of the byelaws shall be deposited at the offices of the authority by whom the byelaws are made, and shall at all reasonable hours be open to public inspection without payment.

(6) The authority by whom the byelaws are made shall, on application, furnish to any person a copy of the byelaws, or of any part thereof, on payment of such sum, not exceeding 10p for every hundred words contained in the copy, as the authority may determine.

(7) The confirming authority may confirm, or refuse to confirm, any byelaw submitted under this section for confirmation, and may fix the date on which the byelaw is to come into operation and if no date is so fixed the byelaw shall come into operation at the expiration of one month from the date of its confirmation.

(8) A copy of the byelaws, when confirmed, shall be printed and deposited at the offices of the authority by whom the byelaws are made, and shall at all reasonable hours be open to public inspection without payment, and a copy thereof shall, on application, be furnished to any person on payment of such sum, not exceeding 20p for every copy, as the authority may determine.

(9) The proper officer of a district council shall send a copy of every byelaw made by the council, and confirmed, to the proper officer of the council, whether separate or common, of every parish to which they apply or, in the case of a parish not having a council, to the chairman of the parish meeting, and the proper officer of the parish council or chairman of the parish meeting, as the case may be, shall cause a copy to be deposited with the public documents of the parish. A copy so deposited shall at all reasonable hours be open to public inspection without payment.

(10) The proper officer of a county council shall send a copy of every byelaw made by the council, and confirmed, to the council of every district in the county, and the proper officer of the council of a district shall send a copy of every byelaw made by the council, and confirmed, to the council of the county.

In this section the expression "the confirming authority" means the authority or person, if any, specified in the enactment (including any enactment in this Act) under which the byelaws are made, or in any enactment incorporated therein or applied thereby, as the authority or person by whom the byelaws are to be confirmed, or if no authority or person is so specified means the Secretary of State.

7.3 Relevant Policies and Plans

7.3.1 Review of the licensing provisions for the hackney carriage trade and ensuring that they remain relevant, up to date, promote efficiency and environmental sustainability while meeting the needs of the community, will assist the council in meeting stated commitments within the Corporate Plan. Relevant sections of the Corporate Plan include:

- Creating safe and thriving places by 'enabling people to travel across North Northamptonshire and beyond'
- Maintaining a green, sustainable environment by 'demonstrating clear leadership on tackling environmental sustainability'
- Providing modern public services by 'providing good quality and efficient services valued by our customers'

7.4 Risk

7.3.1 There are no significant risks arising from the proposed recommendations in this report.

7.5 Consultation

7.5.1 For a 12 week period between 30th October 2023 and 21st January 2024, a consultation on the proposal to remove the hackney carriage zones in North Northamptonshire was carried out.

7.5.2 The consultation was on the North Northamptonshire Council Website during this period and a news release was sent out.

7.5.3 All hackney carriage proprietors and driver licence holders were directly emailed at the commencement of the consultation and prior to the closure of the consultation.

7.5.4 Licence holders were also offered the opportunity to meet with officers. Senior officers from Regulatory Services met with trade representatives at meetings in Corby and Wellingborough.

7.6 Consideration by Executive Advisory Panel

7.6.1 The matter was considered by the Sustainable and Prosperous Executive Advisory Panels jointly on 9 August 2023.

7.6.2 The panel considered the report before them and made the following points:

- Members considered there would need to be extensive consultation and that there would be some controversy. A request was also made for consultation with formal groups such as the Hackney Carriage Association in each zone if they existed. There was some concern that pressure would-be put-on drivers to learn 'the knowledge' for the whole area, rather than the current zones, which was onerous, and a suggestion was made that drivers could opt out of wanting to trade throughout the area. Officers clarified that there would be direct engagement with the trade, but it was noted that there weren't associations in each zone.

- Regarding the knowledge test, it would not be possible for a driver to choose not to go to an area. If they were plying for hire on a rank any passenger could request to be taken anywhere and the driver should be able to do so. Whilst there would not be an expectation for a driver to know every area in detail. It was also commented that most would have the ability to use Satnav Route planners to find the quickest and cheapest route.
- It was resolved that the proposal to undertake a consultation process on the potential removal of the Hackney Carriage Zones and Hackney Carriage Byelaws, be recommended to the Executive for a decision.

7.7 Consideration by Scrutiny

7.7.1 This report has not yet been considered by the Scrutiny Committee, but it is planned to take a report to the Place and Economy Environment Scrutiny committee on 30th April 2024.

7.8 Equality Implications

7.8.1 An equalities impact assessment has been carried out in relation to this proposal.

7.9 Climate Impact

7.9.1 The North Northamptonshire Council Hackney Carriage and Private Hire Vehicle Policy will continue to drive standards in the licensed vehicle trade to manage climate impact from this sector. Implementation of emission standards on hackney carriages should see diminished impact from this sector even if a decision is taken to remove zones and potentially increase miles travelled.

Appendix A – Consultation Responses

	Consultation Response	Officer Response
1	Each zone should remain separate, as each zone has its own needs. Corby has always had a dependency on taxis. Due to this, fares have always been reasonable. If you lump them together, the Council will go with the highest rate zone, leaving the other zones to match that fare rate, thus leaving taxi users to find extra money for fares, which at this moment of rising prices across the board, is another kick in the teeth for the people	The same maximum fare tariff is already set in each of the 4 zones. This is a legal maximum not a set fare and hackney carriage proprietors / drivers may agree with their passengers prior to the commencement of a journey to apply a lesser fare. Beyond setting the maximum fare tariff, it is not for the Authority to determine the fares to be charged.
2	Our only worry is for the learning of the knowledge to get a Hackney License. Will candidates need to learn every street and road within all 4 Zones as at present the knowledge test is only needed for the zone that we are currently licensed to ?	If one hackney carriage zone is agreed then a new knowledge test will be required for that zone. The Authority will look to the guidance of the Department for Transport and other similar authorities in determining what form that test should take. Any test will have supporting information available beforehand indicating the level and type of knowledge that is to be expected.
3	Regarding the consultation of hackney carriage zones, I would strongly propose that we keep the zones the way they currently are. The concerns are the following; <p style="padding-left: 40px;">If current drivers are to operate in new areas, I assume there will be additional requirements such as; a new knowledge test of an unfamiliar area. Whereby this would be difficult and unfair for current drivers as we do not operate in these zones. This will put our jobs and livelihood in jeopardy, potentially losing our badges.</p> <p>These are serious concerns for feeding our families and paying our mortgages</p>	Please see response to 2 above

4	<p>I disagree with the removal of Hackney Zones. These are the following reasons:</p> <ol style="list-style-type: none"> 1. OVER CROWDING in one area with hackney carriage's will cause lack of service in other areas. 2. SAFETY OF DRIVER certain areas charge under the Hackney tariff so if one of the drivers from other areas goes to that zone and charges metered fare they could get attacked by members of the public and accused of overcharging. (IE Corby). 3. INCOME if the zones are removed drivers in certain areas would have to work extra hours to make same income as more drivers over populated in one area. Other areas will lack service as no taxis. 4. KNOWLEDGE TEST drivers that are already licenced should not be put through the test. All new applicants should be required to do the test. This should be part of the consultation as it plays a big part in the process. The SAFEGUARDING TRAINING SHOULD BE DONE WITH IMMEDIATE EFFECT TO PROTECT DRIVERS AND VUNRERBLE PASSENGERS WE SHOULD NOT WAIT UNTIL RENEWAL AS SAFEGUARDING IS A DAY TO DAY PRACTICE IN THE TRADE 5. GRANDFATHER RIGHTS the policy states that we have 5 years from 01/04/2023 existing Hackney Vehicle Licences, as half of our fleet are saloon hackney carriages this would put financial burden on the company as feel the drivers on renewal would just opt for private hire licence. 18 vehicles to replace as would become unusable would cost my company nearly £400.000 to replace the fleet. The general public suffer as no longer have the ability to hail taxis. The most logical thing to do is give licenced drivers grandfather rights on Badge Licences to run alongside the 5 year policy. 	<ol style="list-style-type: none"> 1. It is unclear where the issue of overcrowding might arise. If this relates to hackney carriages descending on what are thought to be "hot spots" for customers then it will soon become clear what business is actually available. It is anticipated that if the decision to move to one zone is taken, then there will be a period of settling down while those businesses that wish to look to grow their business elsewhere test the water to see what is available. 2. See 1 Above. 3. The market will need to adjust to the new area. 4. See 2 above 5. The 5 year grandfather rights period was introduced with the new policy to allow businesses to plan and start to replace vehicles which did not meet that policy and to improve emission standards as quickly as possible. While the hailing of taxis is one of the legal rights that only a hackney carriage has, the practice is infrequent these days with most customers using ranks or booking.
5	<p>As a Hackney Taxi Owner/Driver for some 25 Years i have seen many changes ,Some positives and many negatives of recent times, However on this occasion this is Beyond a Step to Far,The Knowledge and</p>	<p>See 2 above</p> <p>No impact survey has been undertaken</p>

	<p>Complications off a 382 mile radius is quite simply more than crazy It would not be cost effective or enviromently friendly to operate or run a business in this manner and lead to Public Confusion , For example(Saloon Hackneys on Corby Ranks that cant take Wheelchairs) !!!! It seems to me that Whoever is driving/recomending this policy has quite clearly, Beyond a doubt, A total lack of understanding and knowledge off the Trade and most importantly the needs of the Public ! Since the formation of NNC the Hackney Trade has been desimated and seriously destabilised ,With many Drivers/Owners Opting to depart the Business as a result of additional soaring costs and more regulations and costly courses.(Look at the Data on Drivers leaving over that last 3 years) I would also ask if an impact study has been done regards this recommendation ? I would strongly urge the executive committee/ elected members on this occasion to please listen to the Trade and the Public of whom we all serve , But i fear my concerns will not be brought to your attention when you meet in due course.</p>	
6	Hi I'm against the remove off the zone thanks.	No comment
7	Hi! I dont agree with that removal zone at all.thanks	No comment
8	I disagree with the removal of hackney carriage zones	No comment
9	Hi We want the zone to stay the same. Thanks	No comment
10	I don't think it is a good idea I am quite happy working as I am I have been. a taxi proprietor for nearly 28 years and don't think all these changes you are making are an imprimovement to the profession the opposite you are discouraging people comming in to the trade Corby is a taxi town has been for 60 years and the people of Corby are happy the way it is as for the 4 years or under vehicle you can only buy it is crazy.	No comment
11	The objections of the trade from Corby Hackney owners association has been made quite clear to yourselves!i It is not in the consumer's interest in Corby or any other zone to allow drivers and vehicles to be of a lower standard than what is being used today. Simply put you will be allowing saloon cars to ply for trade at ranks and on the street that has always been done by purpose built or	The Council's policy is that all hackney carriages will be wheelchair accessible. When the policy was introduced it was agreed that grandfather rights would permit existing vehicles which are not wheelchair accessible to continue to

	converted vehicles driven by licence holders who know where they are going! It is quite ridiculous to use a false premise that drivers should stay in the location that they drop to achieve a return fare.	operate for a period of time. The Hackney Carriage and Private Hire Vehicle policy is to be reviewed within the next 12 months and the Authority may wish to review this position.
12	I am totally against proposed de zoning consultations.	No comment
13	I disagree with the dezoning proposals. The reason being that you will have taxis from the other towns taking spaces on the taxi rank. Which will cause bad feelings with drivers in the towns that they operate from. There are numerous other reasons that would cause arguments and disagreements between drivers.	If the decision is taken to introduce one zone then any licensed hackney carriage driver will have the legal right to go to any rank in the district. Any evidence of drivers behaving inappropriately as a result of the decision will be dealt with under the policy.
14	As a hackney carriage proprietor plate hc [REDACTED] being a driver since mid eighties and now hearing 61 tears of age im winding down and having to learn the expanding streets of corby is enough for my forgetful in age brain also having a disability I understand the need for wheelchair accessible vehicles but corby in general have always had a fleet of now 114 wheelchair vehicles it's the price of obtaining a hackney drivers licence that needs addressed as there is very few new drivers .this policy has already caused a lot of my fellow licences holders to not renew because of this me proposal don't try and fix what isn't broke corby ran well before this merge of councils.	Licence fees related to hackney carriages and private hire vehicles are costed to provide a cost neutral service. Work is currently under way to ensure that new fees and charges properly reflect the North Northamptonshire Council licensed vehicle service costs. It is understood that cost of living pressures are a significant factor in determining choices.
15	I feel the zones should be kept as they are as being a driver in Corby for over 27 years I'm still learning some of the new streets now. If someone from another zone was to start picking up then the customer will be getting charged a lot more for the fare for the simple fact that they won't know where they'll be going. This will be the same if I was to pick up in a different area.I hope you'll consider this when making your decision	See 2 above. The comment "I'm still learning some of the new streets now" is an indicator that the approach to the knowledge test is in need of review.
16	Hi,I am a cab owner and driver and I am totally against dezoning and I consurned about the effects on which it will have on my and all our community of taxi drivers.	No comment
17	I don't agree with dezoning. I think in my opinion if council will combined the zone there will be few problems. it will be very difficult for local taxi drivers to work specially in kettering on the rank. Main Rank we can park only 4	There are currently 7 rank spaces in Silver Street/ Dalkeith Place Kettering for daytime use with an additional 10 spaces on the

	taxis. Basic knowledge of the area.to learn the roads in new area would be challenge.	Horsemarket to service the night time economy. See 2 above with regards to knowledge tests
18	Hi I'm against the remove of the zones thanks	No comment
19	I am in the favour to remove zone Reason 1st customer have more easy excces to transport 2nd more compatatibe price 3rd and most important envourment frendly less dead milage and less emmission	No comment - supporting one zone
20	Disagree.	No comment
21	In response to your previous email I am getting back to you on the topic by disagreeing.	No comment
22	I Mr [REDACTED] licenced Hackney driver in Corby have many concerns about the rezoning rule implementation. I would like to know how the pricing structures will continue, trading with in sky cabs. Does this mean that our prices will have to fall in line with the rest of Northamptonshire. Thus rendering our trade in corby at great risk of collapse. Many people in the town are on minimum wage or universal credit so any price increase represents a major threat to our business. It is unclear as far as I can see what will happen to the knowledge test, will any future test mean I have to have street knowledge for the whole of NNC. In summary looking at all the rule changes I find it hard to see how NNC will enforce all rule changes on all vehicles.	See 1 & 2 above
23	<p>1. It will negatively affect the business of drivers in Corby. Corby drivers are not interested in going out to other zones to work and want to stay in Corby and drive loyal customers.</p> <p>2. Local customers want local drivers. We have established great relationships with our customers over the years and we have a very good reputation. Drivers from other zones won't have the same relationships and I am worried about them damaging our perception with locals.</p> <p>3. The argument for customers not being able to flag down a driver from another zone isn't relevant - in my experience of driving cabs for 16 years, when I have been in another zone, I have never had someone flag me down. We typically go in other zones when there are plenty of taxis on the road (such as for peak time account runs), so it doesn't give customers more options.</p>	<p>With regards to knowledge tests, see 2 above.</p> <p>With reference to the loyal customers comments, it is difficult to see the relevance to hackney carriage work. Hackney carriages working ranks pick up the next customer in line and they may or may not know them. Any driver is expected to be professional and provide good customer service.</p>

	<p>4. They don't know our roads just as much as we don't know theirs. Driving taxis is about knowledge of the roads and the shortest route, especially when there are issues on the roads like roadworks or crashes. Also, customers often specify the route they want to take to their destination during the journey. How is a driver not from our zone able to react to dynamic changes. This is equally applicable to me driving in another zone.</p> <p>5. We have an extensive test and licensing process in Corby which takes time to learn the roads. How can I be expected to learn and pass tests for all roads across an additional 3 zones whilst trying to maintain my knowledge of Corby. I am approaching my 60s and it isn't easy to keep up with the new roads in Corby, nevermind to have to learn all other zones. This will also make the licensing and testing process more complicated and will add further costs to us as drivers</p>	
24	<p>I would formally like to raise my objections with regards to North Northamptonshire removing the current licensing zones.</p> <p>I am currently, and have been a Hackney Carriage operator for 36 years within the wellingborough area and if fact my family have served the local Wellingborough area prior to, and during, the intial launch of the Hackney Carriage licensing within the borough, many many years ago. Over the years Wellingborough has implemented some of the highest standards with regards to vehicle, age, condition and even the colour. As a result of this Wellinborough has has some of the most distinguished taxis in the country (yellow) and more specifically a ceratin shade of yellow, thus ensuring that they are easily identified by members of the public. Although this has added additional cost to the operators it has given the public and more importantly the old, young and vunerable people the ability to feel safe knowing that the car they are entering is in fact a local taxi.</p> <p>In addition to this Wellingborough has also had some of the most stringent rules with regards to the age, specification and condition of vehicles and when you compare to its nearest Zone (East Northants). As a result of this Wellingborough operators have been forced to invest thousands of pounds when purchasing new vehicles to meet the age limit, standards</p>	<p>The Authority has introduced the new North Northamptonshire Council Hackney Carriage and Private Hire Vehicle Policy to standardise requirements across the trade. There is a window where there are still differences but this will be closed in time.</p> <p>All drivers are expected to be at the same level. No driver loses their licence for failing a test. The option to re-sit is available.</p>

and colour requirements (respray for licensing). As the standards within Wellllingborough have enforced and maintained for so long i cannot understand why council are prepared to lower these the standards to allow operators from other zones, with much lower standards or vehicle requirements to operate with Wellingborough creating confusion and risk to the public..

Whilst the current Hackney carriages standards (colour) allow the public to identify licenced vehicles correctly eliminating the current zones would leave the public ar risk of getting into an unlicensed or private hire vehicles without the knowledge of such.

Over the years Wellingborough has had, and still has, issues with private hire vehicles illegally plying for hire putting the public at risk. This has been ongoing and has never been managed by the licensing authority, to allow the dezoning of the hackney carriages will create further confusion and risk to the public not knowing what vehicles are licensed to convey passangers. Please remember they have had and been familiar with Yellow saloons or Black taxis that were introduced 24 years ago.

In addition to the above concens i would also like to bring to your attention the financial implications of this. Approximately 10 months ago i replaced my vehicle and to meet the current standards. During this process i sent various emails and pictures of the vehicle to the council to ensure that it met the strict standards. The pictures that were sent of the vehicle were to show what i would have classed as tinted windows in the rear. The response i had was that i would have to purchase the vehicle and hope that it met the required standards but there was no guarantee. As this was high risk i was forced to look for another vehicle that required me to invest over £20,000 to do so, yet the licensing authority in East Northants were accepting vehicles of a much lower standard that could be purchased for less than £5,000....How on earth can this be considered as fair competition.

If the zones are to be removed and the standards currently operating in

Wellingborough reduced by allowing vehicles with a much lower standard and age of vehicle to operate, (previously licensed within East Northants) are the council going to compensate current operators that have invested thousands ?

Whilst i understand that standards and requirements change, logic has to be applied. If the council propose to eliminate the zones wouldn't this be prudent to do so when the same standard and vehicle requirements actually comes into force. i.e the current proposal of electric hackney carriage taxis.

There have been Further financial impacts as a result of the enforced price increase, that resulted in Hackney Carriages losing out of town work into other zones due to the high fares and has pushed this work to private hire vehicles.

I would also like to raise my concerns with the requirements enforced for current drivers to complete the new tests

As an example: I have been driving a licensed hackney carriage vehicle in the borough since 1988 and whilst doing so am proud to say that i have never has a complaint made against me in person or to the council in relation to my driving standards, my level of English and maths, routes taken or conduct, yet if i make a mistake on one of these tests i would be forced out of work with costs for the vehicle still required....can this really be considered as fair? Would you consider it reasonable to take away someones livelihood because they made a mistake on a test even though they had been doing the job for 36 years without complaint.? To compound this even further the council has introduced these new test to existing drivers, how on earth can this be considered a required standard where a driver can continue to be a fit and proper person to hold a hackney carriage license for the remainder of his licence period (potentially three years) but when renewing might fail a tests that could result in his license not being renewed. Do you sit tests to keep your job ?? I totally accept and support high standards, and agree that new drivers should complete these tests but i cannot understand or support this for current drivers unless

	<p>complaints have been received. However, I would suggest where complaints have been received, the driver should be interviewed and if the driver found to be at fault the relevant applied.</p> <p>I hope you can consider my comments and continue to support the individual licencing across the four zones. I would appreciate your consideration to the fairness of testing for current drivers.</p>	
25	<p>Hi I would like to put my views across for the removal of Hackney zones. Just in case my last one was "lost"</p> <ul style="list-style-type: none"> • what % of drivers from each zone do you propose will enter the other zones for work • is this free run or by way of having a job...Cross borders if you will • how was this data collected • can this data be made available to scrutinise • from what can be estimated via group chats and social media. The cross will happen if any between Wellingborough and Rushden; then Kettering and corby. Anything else the distance to too great, just to drive to the other zone. Which will mean in 4 years Wellingborough and Rushden will not have any hackney's as everybody is committed not to change to WCV • what will be done in ways of enforcement for when drivers take issue with other drivers being on the rank <ul style="list-style-type: none"> • knowledge test across the 4 zones. With technology is this needed if de-zoned. The test is costly and out dated. With needing to know 382 sq miles. London covers 6 sq miles Councils such as below have done or are doing away with it • bury • Plymouth • TFL considering • what lessons are being learnt from the judicial review happening Currently in North Yorkshire • what guarantees will we be offered that we will not be breaking the law • safety - the taxi licence main purpose is to maintain public safety. This will not make a difference either way, so why implement <p>As a side issue. I have floated an idea which seems to be gaining pace....if the council would agree to having a mixed fleet.</p>	<p>Many of the points raised here have been addressed above. The reference to the Judicial Review of North Yorkshire Council who have gone through the removal of zones relates to alleged errors in process.</p>

	Wellingborough and Rushden would support the changes. With Kettering not really voicing an opinion. That would only leave corby in disagreement.	
26	Does this mean taxis from other areas can work from Kettering Taxi ranks. If so the zones shouldn't be removed as it is already difficult to get on the Taxi ranks in Kettering at the weekends.	No comment
27	I have been a Hackney carriage operator in Corby since 2007. In that time I have also represented the Taxi owners and drivers in dialogue and opinion with the then Town Council. These meetings were in my opinion the best way of inclusion on decision making and real life scenarios that would occur within the trade. Since the new Licensing Authority has come into place there has no longer any dialogue, or the dialogue that has taken place has been unprofessionally not minuted which is inept to say the least. The zones should remain as they are. The public deserve the best possible service and by maintaining the zones the public will be served. The councillors should take note of this. In one of the Licensing committee meeting's I attended it was put to the councillors that if I were to take a fare to Wellingborough and there was somebody waiting on a rank for a taxi I would have to drive straight back to Corby as I was not permitted to ply for hire in another Zone. Which I and all the other Hackney drivers throughout the Zones are aware of, what was disappointing was that the councillors sold it to one another that the person on the rank wanted to go to Corby and the poor Corby taxi driver couldn't take the fare. It was absolutely ridiculous coming out with a 1 in 100 million chance of that ever happening it put a slant on the whole case or biased leaning towards what they want Which is de zoning. I'm going to fight this all the way.	No comment
28	Good morning I am totally against proposed deboning as it will highly effect my business which I have worked hard to build for 19yrs	No comment
29	Good evening I'm writing this email about the the proposed Hackney carriage zone change. I don't believe it's fair on us as a Hackney driver having already done all the tests. To pass also the new driving and wheelchair tests. Just for us to be told we need to do a new test for all of North Northamptonshire. I only want to be able	See 2 above

	to pick up in the kettering zones as this is my where I live.	
30	I am against the dezoning.	No comment
31	I think it's better if the zone restrictions finished many thanks	NO Comment - supporting one zone.
32	Hi I strongly oppose to this as this will make nearly impossible for any driver to pass the Hackney licence and plus the local public will suffer as well as they will not have any Hackney drivers left to serve the public. Thks	No comment
33	I am totally against this , and believe it is a ridiculous idea !	No comment
34	Good morning Taxi licensing Team. I'm against the removing of zone. Regards	No comment
35	<p>Note this response follows the format of the consultation on the website)</p> <p>1 In what capacity are you responding to this survey? Hackney Carriage driver/proprietor, Resident of North Northamptonshire Other: The proposal</p> <p>2 To what extent do you agree or disagree with the proposal to remove the zones? Strongly disagree</p> <p>3 If you think the proposal would have a positive impact, then please tell us why here: Positive impacts:</p> <p>4 If you think the proposal would have a negative impact, please tell us why, along with any suggestions on how any potential negative impacts could be reduced or avoided: Negative impacts: I don't agree that zones should be merged. There isn't sufficient place in Kettering silver street Taxi rank as customer doesn't come to any other taxi rank and there are always queuing to get a spot to pick a fare if other zones Hackneys are allowed things will get more worse for Kettering drivers. I understand the reason you stated that why zone should be merged. "While the Authority's new policy requires that all new hackney carriages are wheelchair accessible, this will take time to impact on the whole fleet so, in the meantime, the removal of zones will allow these existing vehicles to operate across the whole Authority area." But if someone needs a wheelchair Hackney vehicle they can always private hire a Hackney vehicle from other zones.</p>	<p>No comment to much of what has been said here. With regards to rear wheelchair access on hackney carriages, this was never considered as sufficient access to the rear of a hackney carriage when queueing on a rank would not be possible and the customer is most likely to have to go down and up kerbs and be in the highway for access to and egress from the vehicle.</p>

	<p>5 If there is anything else that you would like to tell us that you have not already told us, you can do so here: any other comments: The business is already low because of cost of living crisis the vehicle requirements for the new Hackney carriage isn't affordable for most of the driver as it costs around 50K. This will cause disappearing of the Hackney carriage in the future. In West Northamptonshire the Hackney carriage vehicle is allowed to have wheelchair access from the rear and those vehicles are affordable and more economical to run the business please consider to allow those types of vehicles in North Northamptonshire. Thanks</p>	
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