

Consultation Analysis

Table 1.

Responses are copied as received in Table 1 below. Where personal or sensitive information was provided, this has been omitted.

	Respondent Identifier	Policy/Appx Ref	Query/Comment	Officer Response	Change made to draft Policy or Appendix
1	Local Resident	Main Policy Appendix E	I can't see any reference to failing to follow the highway code. Taxis and any one carrying the public should abide by the rules of the road maybe that should be added to policy. I think this would make to roads safer and show a good example to other motorists. As I said earlier good driving practices and adearance to the highway code should form a part of a drivers licence conditions	Licensed Drivers are expected to adhere to the Highway Code and non-compliance is dealt with outside of the remit of hackney carriage and private hire licensing. However, where repeated breaches are notified, the Council proposes to modify its current list of penalty points, to allow points to be awarded, for example, for repeated parking offences.	No.
2	A local resident & Service User	No comments made.		None.	No.
3	Current Hackney Carriage/Private Hire Licence Holder	Main Policy	There is no positive impact to drivers. You have not considered self employed drivers in this. You've designed a policy that creates a loss for drivers. Us as taxi drivers are not new drivers, we have been working for years if not decades. It feels counter intuitive to make your existing license holders go through retaking a test, you should have new drivers go through this. It's also discriminatory towards people who have English as a second language and other requirements. In addition you're	Existing drivers holding a hackney carriage driver licence, or a dual driver licence will be required to complete and pass a revised driver topographical knowledge test because of the transition to a single (and much larger) hackney carriage zone. Hackney Carriage drivers and Dual licensed drivers	No.

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			<p>requesting people to spend more than £30,000 on a new car that many drivers cannot afford. It's simply financially not feasible and you're ending up pushing drivers out of a business. If you have an expectation that drivers should have a specific car to be a taxi driver you should subsidised the costs.</p> <p>Having to pay for a very expensive car as a requirement to be a driver is awful. How do you expect self empowerment staff to do this? Most drivers are ok minimum wage. You have not considered a core group of people.</p> <p>Also if you fail the exam you should flag what questions the driver got wrong so they can learn, you currently don't do that.</p>	<p>need to have a good working knowledge of the area for which they are licensed because hackney carriages can be hired immediately, directly with a driver, at ranks or on the street and so drivers are not able to prepare a route. The Council, and in line with guidance issued by the Department for Transport, aims to ensure that the stringency of the test reflects the complexity or otherwise of the local geography and in accordance with the principle of ensuring that barriers to gaining or keeping a licence are not unnecessarily high. The specifics of the revised driver topographical knowledge test are subject to separate consultation.</p> <p>The Council does not stipulate how much licence holders should spend on a vehicle. The Council previously proposed that all hackney carriage vehicles should be wheelchair accessible to try to ensure availability for as wide a section of the travelling public as possible and this stance has not changed following update. Currently, the requirement applies to some zones. The Council proposes to relax the maximum age limits applied to wheelchair accessible vehicles and to</p>	
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		<p>Appendix C</p> <p>Any other comments</p>	<p>It's incredibly costly. You need to give financial reimbursement to drivers if you expect th</p> <p>This survey is awful. You've made it bulky and you're sharing policy details with regular folk who may have never read policy documents. Your surgery is not user friendly and therefore the likelihood of your results being biased to the favour of your policy is high. Clearly majority of the people impacted by this policy is against this. Did you ever do any research prior to your policy? Are you trying to make your policy fit when there are no grounds for it as it doesn't seem reasonable? You have so many different appendixes, anyone would tell you this is not the way to gather feedback well</p>	<p>vehicles with ultra low emissions or which are zero emissions.</p> <p>No substantive/material changes have been made to Appendix C and it replicates, aside from a small number of changes, the current Private Hire Vehicle Conditions.</p> <p>The Licensing Team will pass along feedback regarding the design and functionality of the online survey to the Council's Engagement Team.</p> <p>The Policy and its supporting Appendices are quite lengthy. This is accepted. There are many considerations and responsibilities in delivering the hackney carriage and private hire licensing regimes and this accounts for the length of the consultation documents.</p>	
4	Local Resident	Main Policy	<p>This is impacting my father as he's a driver. You're expecting him to spend an extortionate amount of money getting a new cab because of this policy. Post of the drivers are on minimum wage and don't have this kind of money to spend on a cab. I'm unsure how this policy passed as it doesn't seem like you've spoken to any taxi drivers in the making? I agree that you need disability access but if this was your prime reason as a council you would then employ some taxi drivers yourself and</p>	<p>The Council's Licensing Authority's interventions are focused on mitigating safety risks for passengers and drivers and enabling fair competition within the trade by ensuing consistency of regulation and enforcement. We</p>	No.

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			<p>give them these vehicles. It's bizarre to impose this rule to a group of self employed people where it costs about £50k for a black cab. You're going to cause a bigger issue as my assumption is many taxi drivers will not do this and you'll loose a large work force of drivers causing a huge part of your population unable to travel well (assuming most of your elderly population only use cabs and not public transportation so you think so many issues here).</p> <p>As you know organisations like Uber eats and Deliveroo have been welcomed into the area and many drivers have the transferable skill now so fortunately they don't have to come to your awful and thoughtless charges. The loss will be two fold 1. You have not looked out or thought about your drivers so they will leave and the ones that stay will loose any respect and trust with the council and 2. You're likely going to see a significant drop in your drivers resulting in the opposite of your intention.</p> <p>The way you've delivered the policy's are also not user friendly. Many of your drivers do not have English as their first language and even the ones who do are likely not use to reading bulky policy documents. How do you expect them to fully engage with this survey and the policies?</p> <p>The whole thing seems very thoughtless and through the lens of one or two people in the council and not through careful research of what the people and individual user groups need.</p> <p>I'm assuming there has been heavy backlash which is why this consultation is needed, and I wonder how much time and money could have been saved if there was a discovery process at the beginning to consult and co-produce this policy.</p> <p>Is there actual room to adapt this policy due to all the complaints you have got or is this another forum where people will not be listened to?</p> <p>How do you propose to gather feedback inclusively for groups such as those who don't have English as a first language or those who are not digitally literate?</p>	<p>expect business owners to invest in their vehicles to ensure that they are roadworthy and can offer safe and comfortable transport for all passengers. The Council does not stipulate how much licence holders should spend on a vehicle. The Council is proposing that all hackney carriage vehicles should be wheelchair accessible to try to ensure availability for as wide a section of the travelling public as possible. The draft Policy proposes relaxing the current 4-year maximum age policy at first licensing for wheelchair accessible hackney carriage vehicles and proposes to allow such vehicles to remain licensed for up to 15 years, subject to any impacting environmental standards which may be implemented during the duration of the licence.</p> <p>All licensed drivers are expected to be proficient in oral and written English language skills. Written English proficiency is relevant because this may affect a driver's ability to understand written documents (such as application form requirements, licence conditions, and policy documents), which include policies and guidance relating to protection of children and vulnerable adults. Oral</p>	
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		<p>Any other Comments</p>	<p>Do you know the average reading age for your users? The average reading age in the U.K. is 9 years old. Do you think your policies fit this need for people to engage with it?</p> <p>Please reach out to me to discuss this further and if you need any help. My day job is consulting into government for transformation and digital transformation and I would be happy to offer probono support to solve this because it's a clear pain point people are feeling.</p> <p>[Email address omitted]</p>	<p>proficiency is relevant in identifying potential exploitation through communicating with passengers and their interactions with others. Language proficiency brings wider passenger benefits e.g. a driver's ability to demonstrate an understanding of the desired location, and estimation of the time it will take to get there and common passenger requests, such as being asked to activate temperature controls in the vehicle or providing a written receipt.</p> <p>Where a driver has a disability (and this is supported by documentary evidence) which prevents them taking or passing the oral and or written elements of the assessment, we would consider exempting them this requirement. Each case would be considered on its own merits.</p> <p>Feedback from drivers, proprietors, and operators has and will be considered when agreeing a new Policy and Appendices.</p> <p>Many of the proposed new requirements, or changed requirements, have resulted because of the Council's decision of July 2024 to transition to a single hackney carriage zone,</p>	
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				which was consulted upon separately, and which is in line with guidance issued by the Department for Transport.	
5	Local Resident	No comments made.		No comment.	No.
6	Current Hackney Carriage/Private Hire Licence Holder	Main Policy	I feel that if you are wanting to change the policy for Hackney drivers it should be for the new drivers not the drivers who have already got a Hackney license and hold it for years.	All licence holders are expected to comply with the same requirements to ensure consistent standards.	No.
7	Local Resident & Service User & Current Hackney Carriage/Private Hire Driver	Main Policy	Should be left as it is works OK. I have been driving hackneys in corby for approximately 40 years .and it works . Fine as it's own zone	No comment.	No.
8	Current Hackney Carriage/Private Hire Driver	Main Policy Driver Licence Conditions	Limiting Hackney cabs to no more than 4 years old will have a devastating effect long term. The age of the cab is irrelevant. It should be the condition of the vehicle that matters. That is why if you ever go to London you will see cabs 10 years old that look brand new. Too many hoops to jump through coupled with the expense that goes with it will discourage new drivers coming into the trade. Long term this will have a detrimental effect for the customer	The proposed Policy suggests relaxing the age policy in respect of wheelchair accessible hackney carriage vehicles so that they may be presented for first licensing aged more than the current 4 year maximum. The length of time they may be licensed is also extended in the draft Policy to 15 years (instead of the current 10 years for non purpose-built vehicles). This age maximum is subject to the environmental commitments regarding the phasing out of non ULEV and Zero Emission vehicles.	No.

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9	Current Hackney Carriage/Private Hire Driver	Criminal Convictions & Suitability Policy	Keep customers safe knowing there drivers a god citizen	No comment.	No.
10	Current Hackney Carriage/Private Hire Driver	<p>Main Policy</p> <p>Driver Licence Conditions</p> <p>Hackney Carriage Vehicle Licence Conditions</p>	<p>The policy of Corby cabs going to areas outside Corby to pick up fares is unworkable unprofitable</p> <p>The cost of obtaining a Hackney licence is prohibitive</p> <p>The idea of all hackneys being the same colour is laughable and prohibitive and an added expense to purchasing an already expensive vehicle</p>	<p>The Policy proposes that private hire vehicles may be of the standard manufacturer's colour, but should not be black, but hackney carriage vehicles must be black. The Council has had regard to the Department for Transport Guidance (2023) which says the following at Paragraph 8.12:</p> <p><i>Members of the public can often confuse private hire vehicles with taxis, failing to realise that they are not available for immediate hire and that a private hire driver can only fulfil pre-booked requests.licensing authorities should seek to differentiate the profile of private hire vehicles...Licensing authorities should not impose a livery requirement on private hire vehicles. The more distinctive a private hire vehicle is made to appear, the greater the chance that this might be confused with a taxi. To assist the differentiation further, licensing authorities which require taxis to be a particular colour, should prevent private hire vehicles from being that same colour.</i></p>	No.

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11	Local Resident & Service User	<p>Driver Licence Conditions Private Hire Vehicle Conditions</p> <p>Exemptions from displaying a licence plate</p> <p>CCTV in Hackney Carriage & Private Hire Vehicles</p> <p>Executive and Special Occasion Vehicles</p>	<p>need robust conditions to ensure public safety</p> <p>Makes sense</p> <p>Should be open & transparent</p> <p>enhancing a feeling of safety</p> <p>tend to disagree - licences should be clearly displayed at all times</p>	No comment.	No.
12	Local Resident	<p>Main Policy</p> <p>Criminal Convictions & Suitability Policy</p>	<p>Tend to agree - keeping people who use the service safe</p> <p>everyone should know they will be in safe hands when booking. the list should be rigouresly enforced and regulsr checks made.</p>	No comment.	No.
13	Local Resident & Service User			No comment.	No.
14	Not provided	No comments made.		No comment.	No.
15	Current Hackney Carriage/Private Hire Licence Holder	No comments made.		No comment.	No.

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16	Not provided	No comments made.		No comment.	No.
17	Current Hackney Carriage/Private Hire Licence Holder	No comments made.		No comment.	No.
18	Local Resident	No comments made.		No comment.	No.
19	Current Hackney Carriage/Private Hire Licence Holder	No comments made.		No comment.	No.
20	Not provided	Main Policy	I strongly disagree with the age of vehicle in North Northamptonshire	No comment.	No.
21	Representative of Town/Parish Council	No comments made.		No comment.	No.
22	Current Hackney Carriage/Private Hire Licence Holder	No comments made.		No comment.	No.
23	Not provided	Main Policy	Still waiting for officers to consult with us about knowledge test	This is subject to a separate consultation process.	No.
24	Current Hackney Carriage/Private Hire Licence Holder	No comments made.		No comment.	No.

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25	Current Hackney Carriage/Private Hire Licence Holder	Main Policy	I have read the policy and I didn't see anything about vehicle age so is that means 4 years of age rules getting rid of it on this new policy ?	Comment provided at 8 above covers this point.	No.
26	Current Hackney Carriage/Private Hire Licence Holder	Main Policy	<p>Good evening all</p> <p>I have been speaking with hackney drivers in Wellingborough and Rushden</p> <p>Please see attached. I'm hoping we can get together to discuss this further</p> <p>@Councillors - I am unsure who has influence for this, but would be happy to discuss</p> <p>@[redacted] - I am lobbying so the public does not loss a service</p> <p>@evening telegraph - could we look at getting an independent view from the public</p> <p>Copy of Correspondence attached to Email:</p> <p>Good evening all</p> <p>I am writing to you about the new policy about replacing the hackney's with all wheel chair vehicles (WCV).</p> <p>I am one of the yellow cab drivers in Wellingborough looking at the new policies knowing that a £60-70k investment into a WCV is not viable for my business turnover.</p> <p>This policy will in effect mean that I will have to shut my business, or revamp to private hire; which is a completely different business model</p>	No comment.	No.

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		<p>I wanted to discuss these points</p> <p>Wellingborough rank was deregulated in September 2000 to allow the introduction of WCV to Wellingborough.</p> <p>In this time we had 34 WCV licenced and trading in Wellingborough. We now have 5 left.</p> <p>While they was here it was clear the public did not want or need them as customers would bypass them to get into the yellow cabs</p> <p>In the coming years, because the trade was not there for them they faded away to what we have now.</p> <p>The ones we do have predominantly are for school runs and are rarely on the taxi ranks.</p> <p>I have posed some of the above at a recent meetings, and was told that new business would move into the town. As this new business has been able to trade since September 2000 where are they? how long do you think it will take as it hasn't taken hold in 24 years.</p> <p>Since the new policies have come in we have lofar 1 driver, who has not replaced with WCV. As far as I am aware the is one more leaving; and another considering shortly when his badge is up for renewal</p> <p>The discussion between the drivers and chat groups are that NO ONE will be replacing with a WCV. So, in fact you are stopping a public service which costs you no money, only brings it in via fees.</p> <p>It has also been said that after the harmonisation that Kettering and Corby WCV will be able to use the Wellingborough ranks. Even though in most responses that have been made public, they are going to carry on in their areas which they know.</p>		
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			<p>In effect you are going to have the exact same number of WCV in North Northamptonshire with or without this policy. Only difference is that Wellingborough and Rushden loss a public service.</p> <p>I know when the public complain you will say, but the council have taxis; but they are self-employed. We can't make tem serve your area!!</p> <p>Why cause this situation? If it is a target you are trying to hit, this policy will not bring you closer to it.</p> <p>I believe that thus has started from a Councillor pet project. He told us long before this was a thing it was his dream to have a line of WCV along Wellingborough rank. In reality; it will be as empty as the market the council also killed off.</p> <p>Let's move away from this vanity project. Look at the facts. I gave you examples of other councils doing U turns after all the above has happened. Let's not get ourselves to that point. Let's take the correct action now. Give the public what they want (they voted with their feet once); give the trade what they need to run viable business. Reverse this policy</p> <p>@Councillors you have the power to vote this though. Please stand with the people who vote for you and the public your serve. Do not let the licencing agency take away a vital public service that so many people rely on.</p> <p>Cc: drivers</p>		
27	Current Hackney Carriage/Private Hire Licence Holder	Main Policy	<p>I wanted to get in contact to send my Uncle's letter regarding the union of the taxi licencing. He has been a driver for 44 years and has really struggled with the new changes to the taxi licencing. The 4-year rule is unsustainable and I myself have struggled to get a badge given the new rules. Meanwhile there are fewer drivers whilst taxi owners are being forced to hand their licences back or spend £70k on a new taxi.</p> <p><u>Detail of letter copied below:</u></p>	The matter of transitioning to a single hackney carriage zone was decided by the Council in July 2024 and is outside of the purpose of this consultation. There is no obligation for hackney carriage drivers to operate across the new single zone, they may choose to	No.

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		<p>Subject: Objection to the Proposal for a Unified Taxi Governing Body</p> <p>Dear Council,</p> <p>I hope this email finds you well. I am writing in response to the ongoing consultation regarding the proposed unification of the taxi governing body. I wish to express my objection to this idea for the following reasons:</p> <ol style="list-style-type: none"> 1. Local Needs and Expertise: Taxi services are deeply embedded in the communities they serve, with each area having unique challenges, customer bases, and operational needs. A localised governing body is better equipped to understand and respond to these specific demands, ensuring a service tailored to the community. Centralising this governance risks losing these vital local insights. 2. Operational Efficiency: Existing localised governing bodies often have established relationships with operators and a clear understanding of local logistics. A unified body might introduce bureaucratic inefficiencies and delays, potentially disrupting services for both operators and passengers. 3. Driver Representation and Accountability: Local governing bodies offer drivers accessible channels to voice concerns and influence decision-making. A centralised system could dilute this representation, leaving drivers feeling unheard and disenfranchised. 4. Economic and Practical Impacts: Transitioning to a unified governing body could impose significant costs, both financial and logistical. These resources might be better spent improving existing systems and addressing current challenges rather than overhauling the structure entirely. <p>I have been a taxi driver for over 44 years and have seen recent reduction in the number of drivers and registered vehicles. This has lead to a shortfall in vehicles available whilst plates are being handed back to the council and punters are being left without transport. While I understand the intention behind this proposal may be to streamline operations, I believe such a change could negatively impact the quality of service, efficiency, and accountability within the taxi sector. I urge the</p>	<p>base their operations where they are currently, but they will have the option to use ranks and pick-up fares across the larger zone.</p>	
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			<p>council to consider enhancing and supporting localised governance structures rather than centralising them.</p> <p>Thank you for considering my feedback. I would be grateful if you could keep me updated on any developments regarding this matter. Yours sincerely,</p> <p>[redacted] Badge Holder of Hackney Carriages [redacted]. All registered in zone 2 Corby.</p>		
28	Abhijith Kooloth Valappil Air Quality Project Officer/ North Northamptonshire Council	Main Policy	<p>Section 10: Vehicle Age and Environmental Considerations, Vehicle Specifications and Vehicle Testing Requirements of the taxi policy supports council actions to meet national strategies, policies and legal requirements on Air Quality and Climate change.</p> <p>Paragraph 10.3, 10.6, 10.7 &10.8 : Restricting the age of an internal combustion engine vehicle to four years, promoting Zero Emission Vehicles or Ultra Low Emission Vehicles, and no licensing for diesel or petrol vehicles after 1 January 2030 supports local actions to reduce the emissions of fine and coarse particulate matter (PM10 & PM2.5) and nitrogen dioxide (NO₂) and will assist in meeting the interim and long-term targets of PM2.5 set by the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 under the Environment Act 2021. Reducing air pollution emissions from this policy implementation also contributes to meeting the national ceiling for NOX and PM2.5 set by the National Emission Ceilings Regulations 2018.</p> <p>Even though air quality in North Northamptonshire does not exceed the regulatory limits, this policy will enhance our efforts to improve air quality in North Northamptonshire as part of local air quality management, further reducing health impacts at low pollutant concentrations. As detailed in annual status reports (ASRs), Nitrogen dioxide (NO₂) is the key pollutant of concern in North Northamptonshire, mainly emitted from petrol and diesel vehicles. Changing private hire and carriage fleets to zero emissions or ultra-low-emission vehicles will considerably reduce traffic-generated NOX. Furthermore, the environmental considerations</p>	No comment.	No.

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			are a step towards implementing the approved North Northamptonshire Council Air Quality Strategy 2023 measures paragraph 5.1.3 Taxi Licensing Measures while aligning with Clean Air Strategy 2019 and Environmental Improvement Plan 2023.		
29	Representative of Town/Parish Council	Main Policy	<p>Good morning</p> <p>Thank you for allowing Parish Councils to comment on this review. Please see our response below.</p> <p>Hackney Carriage and Private Hire Licensing Policy review</p> <p>This appears to be a good suggestion, to open up competition and reduce costs. In rural areas the use of taxis can be very expensive compared to towns and cities, especially for the elderly who do not have the option of a car and need to attend doctor and hospital appointments as well as shopping and social activities.</p> <p>Regards</p> <p>Jane</p> <p>Jane Mann</p> <p>Clerk to Loddington Parish Council</p>	No comment.	No.
30.	North Northamptonshire Council's Licensing Team	Policy 5.9	Byelaws have yet to be agreed and may not be agreed prior to the new Policy being introduced.	The Policy includes provision for implementation to be delayed where Byelaws are not approved in time.	Yes.
		Policy 5.11 & 7.2	NNC charges have not been implemented resulting in Corby, Kettering and Wellingborough not having a charge for HAP drivers.	The Policy anticipates harmonisation of fees and application of single or dual drivers' licences.	No.

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	Policy 6.5 & throughout document	Should say Licensing Panel rather than Licensing Sub-Committee.	Accepted.	Yes.
	Policy 7.11	Should aggressive manner be included as there are penalty points for this.	Accepted.	Yes.
	Policy 8.2	Does not read correctly. Outside the 12 weeks could be 14 weeks and they are penalised. Should it say within the 12 weeks. Should the 12 weeks be reduced due to DVLA check codes expiring within 21 days.	Reworded to include the 12-weeks lead-in period but makes clear onus is on applicant to ensure DVLA check code is active/live.	Yes.
	Policy 8.4	Registering with the DBS Update System is not on the penalty points system – feel this should be a suspension only.	Accepted.	Yes.
	Policy 8.6	Does not need to be done at every renewal – only if the check is time limited.	Accepted.	Yes.
	Policy 8.12	This seems to be out of context. Fit and proper/physical health and wellbeing.	Accepted and paragraph deleted. Element of wording now included at bullet point 8.15.	Yes.
	Policy 8.18	Cannot access the DVLA without a DVLA check code for the applicant. Paragraph also states from penalty point issued yet appendix G says 7days from notification.	Accepted and Policy reworded to align with penalty points.	Yes.
	Policy 8.43	Notify of points 5 working day – should that be 7 days from notification or issue.	Accepted.	Yes.
	Policy 8.50	Applicant can also sign up to the service with the application number.	Accepted.	Yes.
	Policy 8.51	Not clear where it says DBS certificate printed off from the update service as this suggests they could have a non NNC certificate.	Accepted.	Yes.
	Policy 8.57	Should say appendix A Criminal Convictions and Suitability Policy.	Accepted.	Yes.
	Policy 8.62	Should have the word suspended within this.	Accepted.	Yes.

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	Policy 8.71	Have to tell us of their medical condition within 7 days but there are no penalty points for not telling us of their change of condition.	Accepted and Penalty Points Appendix updated.	Yes.
	Policy 8.75	Section 9 is incorrect, should be Section 15.	Accepted.	Yes.
	Policy 8.79	Should we include how many times they can take a test.	No accepted.	No.
	Policy 8.84	Should say Hackney Carriage rather than taxi.	Accepted.	Yes.
	Policy 8.85	Can we have further clarification on this as East and Wellingborough have non wheelchair HC vehicles.	Accepted. Policy amended to account for the phasing out of non-wheelchair accessible vehicles in legacy council areas.	Yes.
	Policy 8.91 & throughout doc	NNC should be changed to North Northamptonshire Council.	Accepted.	Yes.
	Policy 10	A table outlining what can be accepted would be helpful here.	Not accepted, but website guidance to be updated to provide summarised information.	No.
	Policy 10.9	To distinguish between hackney carriage and private hire vehicles – (hackney carriages must be black) – private hire vehicles may be any of any standard manufacturer’s colour except for black – accords with DfT Guidance, 2023.	Accepted.	Yes.
	Policy 10.11	More information on Euro NCAP ratings may be helpful at this paragraph.	Accepted.	Yes.
	Policy 10.20	Can this be converted to cc as that what is shown on V5 Registration Documents.	The relationship between horsepower and engine displacement isn’t a direct one, as depends on various factors, including engine type, design, and efficiency.	No.
	Policy 10.22	Electric cars have smaller boots and may not have room for several medium sized suitcases.	Accepted.	Yes.
	Policy 10.37 & following paras	Feel this is too excessive.	DfT Guidance is not prescriptive in this regard. Policy attempts to offer guidance to ensure the safe	Yes.

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				and comfortable transport of passengers using a wheelchair. New paragraph at 10.42 which explains that non-conforming vehicles may be considered for licensing where they depart in dimensions. They must all, however, confirm to the minimum reference wheelchair size – drawing provided in the Policy.	
		Policy 10.54	Where has 31 December 2024 date come from.	Accepted – incorrect date has been amended.	Yes.
		Policy 10.67 & 10.70	Does no commercial advertising mean no business door sign on the rear. 10.70 refers to one advertising panel.	No business sign permitted on PHVs. Removed Paragraph 10.70 as not required.	Yes.
		Policy 11.8 & 11.20	We do not always see the original insurance certificates which needs to be removed. These are uploaded to our online application. Cover notes are usually 28 days so the 31 days should be changed and this repeated in 11.20.	Accepted.	Yes.
		Policy 11.12	Should say where appointments are missed or are cancelled within 24 hours ...	Accepted.	Yes.
		Policy 11.17	Should we add any failures should be retested at original failure garage.	Accepted.	Yes.
		Policy 13.23	Is the wrong appendix – should be appendix I.	Accepted.	Yes.
		Policy 15.22	Should it say reference wheelchair.	Accepted.	Yes.
		Policy 17.12 & 17.13	Can this be simplified?	Not accepted.	No.
		Policy Last page	Alignment of appendices names/description. Last page of Policy says Appendix K Executive & Special Occasion Vehicles and Discreet Plate Condition. Link in consultation says Appendix K Executive and Special Occasion Vehicles. The actual document at Appendix K says Appendix K Special Occasion Vehicles.	Accepted.	Yes.

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		Appendix A	Title does not match the main policy.	Accepted.	Yes.
		Appendix A 2.12	Notification of arrest, etc has been increased from 24 hrs to 72 hrs.	Accepted. Notification periods not standardised across England and Wales. Policy now states, as before, 48-hours on grounds of public safety. Is in line with the largest licensing authority – Transport for London.	Yes.
		Appendix A 2.13	States to inform us within 72 hours, but the Points System does not mention arrest (operator section does) and also states to notify us within 7 days or 8 points awarded – needs clarification.	Accepted and “arrest” added to penalty points list.	Yes.
		Appendix A 2.2	Ticks against vehicle and operator licence which are incorrect. ticks in	Accepted.	Yes.
		Appendix A 2.20	The link does not work.	Accepted and link updated.	Yes.
		Appendix A 2.21	The word “below” needs removing as its not below – Table 1 is couple of pages later.	Accepted.	Yes.
		Appendix A Table 1	Summary of IOL Guidance table. I assume this is best practice again, if so can we make it clear that it is for both driver and operators or who this table is relevant to, bearing in mind a basic disclosure for operators.	Accepted. IOL Guidance is that all offences should apply to all applicants and licence holders, except for motoring offences which do not have direct relevance to private hire operators.	Yes.
		Appendix B	Again, we highlighted this but needs hackney Carriage Drivers added to the title and match main document.	We can't attach conditions to a hackney carriage driver licence. Can attach conditions to a private hire driver licence or dual driver licence. Titles updated to explain what a dual licence covers.	Yes.
		Appendix B 4.1	Change of address form on the website.	Accepted.	Yes.
		Appendix B 6.1	Accidents. It says to notify licensing within 72 hours but goes on to give a telephone number, this can be done using the online reporting method	Accepted.	Yes.

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			and I think this should be changed to reflect this, the accident report form is part of this notification. It also mentions calling the emergency number if calling out of hours. I do not think Out of Hour Operators would be pleased to receive these calls.		
		Appendix B 10.1	Perhaps provide clarification on wheelchairs, or is this another matter of other legislation which does not need to be in the policy?	Not accepted.	No.
		Appendix B 13.1	Lost and Found Property - It refers to drivers handing lost property to their operator, hackney carriage drivers may not have an operator.	Accepted.	Yes.
		Appendix B 15.1	Convictions, Cautions, Arrests - There should be a reference to the online reporting tool.	Accepted.	Yes.
		Appendix C 4 -	Addition of min light transmission standards.	Taken from DfT Vehicle Best Practice Guidance, 2023. 75% and 70% should apply to most cars on the road. The 30% min light transmission on rear windows should cater for most cars, except some executive cars (for which we have a separate policy).	Yes.
		Appendix C 10.3	Vehicles with open luggage space required to have suitable guard/cover – does this need to be permanently fixed or can it be in place when vehicle is in use and passengers are being carried?	Accepted. Policy allows some flexibility but while passengers are being carried, as suitable guards/cover must be in place.	Yes.
		Appendix C 11.8	Should it mention if the vehicle has LED lights the bulb kit is not a requirement. Some drivers have LED bulb kits.	Accepted and document updated to provide greater clarity.	Yes.
		Appendix C 19.1	Change of address forms are available on the website.	Accepted.	Yes.
		Appendix C 23.1	We do not permit trailers, but we have some vehicles with tow-bars.	Not accepted – no change required.	No.
		Appendix D 13	Wearing of driver badge/display in vehicle requirements differ across legacy council areas.	Accepted and document updated.	Yes.
		Appendix E	Remove the wording “the council will only licence purpose-built HCV’s”.	Accepted.	Yes.

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		Appendix E 4	This is new. If all the grandfather rights go then we will be asking some to change the glass in their vehicles.	Not accepted. Grandfather rights maintained until 31 March 2028 for those with licensed vehicles which qualify.	No.
		Appendix E 4.1	Window Tint - same as previous comment.	No accepted.	No.
		Appendix E 10.3	Luggage -different wording from existing policy. Mentions estate cars. (H/C?)	Accepted.	Yes.
		Appendix E 11.8	Bub kit - does not refer to LED lights.	Accepted.	Yes.
		Appendix E 14	Numbering incorrect - 4.7 & 4.8 are missing.	Accepted.	Yes.
		Appendix E 16.8	Is this for only third-party advertising not their business name? Says that Hackneys can have commercial advertising, but 16.3 in the Private Hire section says that they cannot have commercial advertising.	The Policy proposes that commercial advertising should not be permitted anywhere on private hire vehicles. Hackney carriage vehicles can continue to display advertising as per the requirements of the Policy.	Yes.
		Appendix E 19	Change of Address forms are available on the website.	Accepted.	Yes.
		Appendix E 22.1	Vehicle Damage - Accident forms are available on the website.	Accepted.	Yes.
		Appendix F 1.4	NNC needs to be written in full.	Accepted.	Yes.
		Appendix F 3.1	Asks for a basic DBS but application forms ask for criminal history and not sure what IOL best practice is but we all know you can't ask for an enhanced disclosure so clarification on what legitimate checks we can do.	Accepted and document updated.	Yes.
		Appendix G	Penalty Points H/C /P/H driver conditions - Failing to wear badge4 points – H/C drivers are not required to wear the badge but to display (Kettering).	Accepted and document updated.	Yes.

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			<p>Driver points - There is a formatting error and a line is on its own on a page.</p> <p>Private hire operator who ceases to carry on a private hire business failing to return the operator's licence to the Council without delay - Without delay – can we specify 7 days to add clarity?</p>		
		Appendix H 4.3	Just a note to consider for retention of records – saying to keep the record for a period of 11 years (do not think we have a choice in this).	Not accepted.	No.
		Throughout document	Throughout the document it will state five days, then 5 days or 7 days, then seven days. I think this should be one or the other throughout.	Accepted.	Yes.

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Table 2

Table 2 captures where respondents indicated whether they agreed or disagreed that the proposed Policy or Appendix would have a positive impact.

Question	Strongly Agree	Tend to Agree	Neither Agree or Disagree	Tend to Disagree	Strongly Disagree	I'm not sure	Not Answered
To what extent do you agree or disagree that the draft policy would have a positive impact	2	3	3	1	6	1	8
To what extent do you agree the draft Convictions and Suitability Policy would have a positive impact	5	1	2				16
To what extent do you agree the draft Driver Licence Conditions document would have a positive impact	2	2	0	1	1	0	18
To what extent do you agree the draft Private Hire Vehicle Licence Conditions document would have a positive impact		2			1		21
To what extent do you agree the draft Hackney Carriage Byelaws document would have a positive impact		3				1	20
To what extent do you agree the draft Hackney Carriage Vehicle Conditions document would have a positive impact	1	1					22

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To what extent do you agree the draft Private Hire Operator Conditions document would have a positive impact		1					23
To what extent do you agree the draft Penalty Points document would have a positive impact		1	1				22
To what extent do you agree the draft National Register of Revocations, Refusals and Suspensions document would have a positive impact		2			1		21
To what extent do you agree the draft Exemptions from Displaying Licence Plates document would have a positive impact		1	2				21
To what extent do you agree the draft CCTV in Hackney Carriage/Private Hire Vehicles document would have a positive impact		4					20
To what extent do you agree the draft Executive and Special Occasion Vehicles document would have a positive impact	1	1		1			21