

## Zones (Question 5)

The Hackney Carriage zones within the licensing authority should be abolished. At present, we are one of the few operators who work across more than one hackney carriage zone within the county and the practice of splitting the authority into zones is out dated and damaging to the trade and to customers.

- Northumberland County Council should follow the advice handed from government in their 'Taxi and private hire vehicle licensing: Best Practice guidance' document from the Department of Transport.
  - Relating to the questions of 'Taxi Zones' (page 89, point 90) ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/212554/taxi-private-hire-licensing-guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/212554/taxi-private-hire-licensing-guide.pdf)) the advice is clear; *'The Department recommends the abolition of zones. That is chiefly for the benefit of the travelling public. Zoning tends to diminish the supply of taxis and the scope for customer choice.'*
- While we understand that the 'best practice' document is not policy instruction but advice to authorities – it would be unwise for Northumberland County Council to once again ignore advice from the Department for Transport as well as from the trade. As the largest operator of private hire and hackney carriage in the Northumberland licensing area we could not recommend abolishing the hackney carriage zones more strongly
- We understand from previous discussions with licensing officers, minutes from meetings and conversations that Northumberland County Council has decided to persist with hackney carriage zones for the following reasons
  - 'Concerns on driver distribution, with a fear of a significant number of drivers moving from quieter zones such as Berwick to higher volume areas including Blyth Valley and Wansbeck'. This is an incorrect assessment of potential consequences because:
    - The abolishment of private hire zones in 2009 by Northumberland County Council has had no such similar effect on the distribution of services across the county. Private hire drivers have not moved en masse from the North of the County to the South East. You would see no such migration of services if the zones were abolished
    - Hackney Carriage services are more reliant on private hire services than ever. A series of technological advancements in the last decade has resulted in far more hackney carriage drivers undertaking private hire work. There has been no migration of hackney carriage drivers undertaking private hire work from Berwick to Blyth Valley or Alnwick to Wansbeck. Unlike the last consultation, we have the real life results of the abolishment of the private hire zones and there has been no large migration of services as feared. There is no practical cause for Northumberland County Council to maintain it's position on hackney carriage zones
  - The licensing authority has highlighted concerns that abolishing the zones could lead to 'similar problems Durham has experienced following their removal of zones.' As

an operator who holds a license in both Northumberland and Durham there are no continued issues regarding the abolishment of zones in Durham and the local authority in Durham has been justified with its decision

- The comparisons with Durham and Northumberland in terms of taxi licensing were never reasonable in our opinion for a number of reasons (Northumberland does not contain a large city including a major university or a mainline train station)
  - Unlike the last consultation we have the body of proof that time allows which proves it was the correct decision for Durham County Council to abolish their hackney carriage zones. As Durham has historically been used as an example as proof Northumberland should not follow suit – it is essential that Northumberland learns from Durham and abolishes its own zones
- The current zones negatively impact our business and the earnings of drivers while also badly damaging the environment. The reasons for this are as follows
    - restrictions require drivers who wish to move between vehicles or companies to acquire a number of different badges, requiring significantly increased outlay for drivers
    - Drivers with only specific zone badges are restricted on movement between taxi companies, and are also restricted on vehicle use particularly at short notice where their vehicle is off the road for repair. We have, on many occasions, been unable to offer a currently unemployed driver employment who had a badge for which we did not have an available vehicle.
    - There have also been many occasions where we have had an available vehicle but not had an available driver with the correct badge. For example, we operate as a private hire operator in the whole of the South East region. Our drivers have excellent knowledge of the area yet if one of our Blyth Valley cars is off the road they cannot drive a Wansbeck car. The driver is paying Northumberland County Council, knows and understands the area within Northumberland yet the archaic zone system would stop him from servicing the people of the county until the vehicle was repaired when another Northumberland County Council licensed vehicle was available to drive
  - Current zones have an adverse effect on school transport costs for Northumberland County Council. A driver with a badge for a certain zone may operate a school transport run to a school in another zone. Under the current policy this driver would then need to return to their own zone to work through the day, then drive back to the zone the school is in for the afternoon pick up. This means drivers will have to put higher prices on their tender submissions to cover the dead miles and time, with the dead miles having a significant additional emission impact. There are a wide range of specialist schools in different areas that require pupils to travel a long distance for school. We currently operate routes from Berwick to Morpeth, Blyth to Alnwick and Hexham to Seghill. A Northumberland licensed driver, using a Northumberland licensed vehicle, carrying school children within Northumberland and paid for by Northumberland County Council should not have to leave Berwick once the children are at school, drive 110 miles combined (55 miles each way) to sit on a rank in Blyth when the driver could do the same in Berwick. This is impractical, unfair and terrible for our environment.

- Northumberland County Council has declared a 'climate emergency'. The continued existence of zones within the county is at odds with this declaration. The reduction of zones will reduce emissions as drivers will have to drive less miles 'returning' to zones when waiting for return bookings
- There is also an impact on the quality of service available from wheelchair access vehicles. We are currently unable to offer advance bookings for wheelchair users as we cannot ask a driver to drive between towns for a low fare job without their being able to continue to work in the area following the journey. Removing zones would naturally spread the wheelchair vehicles out between the towns of the county and allow a more equal service for wheelchair users. For example, if there were a booking in Alnwick for a disabled access taxi – we currently could not undertake that. However, if the driver could stay and work as a hackney carriage – this journey would be doable.

To summarise we hope we have demonstrated why Northumberland County Council should abolish the remaining licensing zones for hackney carriage vehicles and drivers. Advances in technology, the climate emergency, the body of evidence both in Northumberland for private hire zones and Durham for the abolishment of hackney carriage zones being excellent decisions that have benefitted the public and the trade – all suggest the zones should be abolished

#### **Emissions and Vehicle Licensing Policy (Questions 6 and 7)**

The proposed Northumberland County Council policy for vehicle age limits and emission standards does not go far enough in addressing the polluting nature of the vehicles the authority licenses and plans to license. The reasons for this are as follows:

- Northumberland County Council has recently declared a climate emergency and proposed reducing carbon footprint by 50% by 2025 before becoming carbon neutral by 2030. The current licensing policy allows a large proportion of the private hire and hackney carriage vehicles to be highly polluting older vehicles. This has a significant impact on the air quality across the county and particular in close proximity to taxi ranks, where there are regularly lines of diesel vehicles idling with their engines running. We believe these diesel saloon cars should have an age limit much less than the 8 years proposed for existing vehicles which have already been licensed.
- An effective solution to manage the total emission footprint of the counties taxi fleet is to implement an age limit on all new and renewed vehicle licenses. Whilst we have agreed to the council's proposal on a maximum 4 year age limit on new license applications and 8 years for renewal applications, we would recommend going further and implementing a maximum age of 3 years for new applications and 7 years for renewal applications, with an extra year (4 and 8 years) available for larger vehicles only (5-8 passengers). The policy of 3 years for new applications and 7 years for renewal applications on saloon vehicles was already in place for Blyth Valley before Northumberland became a unitary Authority.
- Alongside this, we believe the licensing authority should further promote the use of zero emission vehicles by installing taxi only charging points in each of the major towns

throughout Northumberland. This would have the additional benefit of reducing conflict between public and taxi driver owners of electric vehicles over charge point availability. Based on the current number of private hire and hackney carriage vehicle licenses in the county the licensing authority could raise approximately £39000 per year by raising the vehicle license fee of all non-electric licenses by just £50. This figure would roughly pay for three rapid electric vehicle chargers every two years. There would also be the opportunity to recover some of the costs by charging drivers to charge, though we would recommend offering a reduced rate to taxi drivers to further encourage electric vehicle take up amongst the counties drivers.

There will likely be considerable disagreement to the above changes amongst the county's drivers, who will likely respond to say that they do not make enough money to upgrade their vehicles and that their cars pass the licensing tests every year and are in great condition. We would like to emphasise that the trade has objected to improvements in emission standards on every possible occasion, and to view the output of this we would recommend committee members to visit the taxi ranks of the region during winter which will show the outcome of repeated driver objections; large numbers of old, polluting vehicles with their engines idling.

We would recommend a maximum timescale of 12 months from the next renewal date for each vehicle (from the time that the policy is implemented) to allow for this change to have any significant impact on the carbon footprint target set by Northumberland County Council in 2025.

#### **DBS Checks for Proprietors, Directors and Partners (Question 10)**

We strongly agree that all directors, partners and proprietors should have valid DBS checks in order to operate within the local authority area. All drivers are required to have and maintain valid DBS checks as part of the licensing policy to ensure public safety. It is a logical step to require those managing those drivers to be held to the same standards. The cost of these checks would not be prohibitive on any operator.

#### **Register of staff who take bookings or dispatch vehicles (Question 11)**

Similar to the above, it would be beneficial in the interests of public safety for thorough records to be kept on each taxi journey taken in the local authority area. We believe that it would be sensible to maintain a register of the staff members who take bookings and dispatch vehicles to allow for accountability at each stage of every booking and that the cost and time necessary to implement this would be minor for all operators. Most modern taxi dispatch systems allow for a register of all staff involved in booking and dispatch to be kept for each journey automatically.

#### **PCV and PSV License (Question 12)**

We strongly disagree with an additional condition being added to Private Hire Operator's Licenses on PCV drivers and PSV vehicles. We believe that this would be an unreasonable condition to add and if action of this nature is taken we would seek to challenge it through the courts.

It is not practical when operating a large fleet to contact customers in advance to advise that a PSV would be sent for the booking where operational changes have been necessary. Customers regularly do not answer the phone to us after they have made their booking and there are occasions where a PSV would be ideally located to complete a booking where it was finishing a prior booking nearby. This would minimise the emissions of this vehicle by reducing dead miles.

We have operated PSV vehicles for a number of years without a single complaint from a customer on the type of vehicle/driver that was used and operate this at exactly the same cost as a private hire vehicle.

The DBS checks that we complete for all PCV drivers is the same standard of DBS check which the local authority obtains for private hire drivers through NEREO.

There is no mention of the use of PCV drivers and PSV vehicles in the government best practice guide, and through research we have not yet been able to find a single local authority that has a policy like this in place.

Every operator that does not operate buses is going to agree with this policy change through self-interest, despite there currently being overwhelming demand for taxis at weekends which cannot be met. We do not believe that any operator that does not operate buses should have an influence on this decision.

### **Additional Points**

#### **Tariffs**

Further to last week's email response request on the current tariffs in the local authority area, we would like to reinforce our position that all tariffs should increase.

Larger vehicles have always, until the most recent fare change, commanded a higher tariff than standard saloon vehicles, both on the initial starting cost and mileage rate. This has allowed parity between drivers of large vehicles and saloon vehicles, with fares reflecting the difference in running costs. Following the most recent change, which allows only an additional 20p per journey for larger vehicles, we struggle to get drivers into larger vehicles and have difficulty persuading those already in larger vehicles to work. This has had an adverse effect on the availability of larger vehicles for customers, which increases the total travel costs of larger groups who will instead need to book multiple smaller taxis.

As a result, the only way for drivers in larger vehicles to cover their additional costs is to put in higher prices for school contracts. The tender process is currently extremely uncompetitive.

This removal of a higher tariff for larger vehicles occurred when the tariff was aligned for all zones. In the consultation on this tariff change, of the 17 submissions there was only one objection to having a higher tariff for larger vehicles. This objection came from an operator running only two diesel saloon vehicles. The decision to remove the higher tariff makes a mockery of the consultation process.

The most recent tariff change in 2018 saw an increase of 27% for saloon vehicles but an increase of only 5.8% for larger vehicles. The tariff for saloon vehicles and larger vehicles is now the same other than an increased pick up charge (£0.20). As a result of this, we have seen a significant reduction in the number of drivers who are willing to operate larger and wheelchair access vehicles.

The Consumer Price Index for passenger transport has the associated costs of providing transport as having increased from 115.9 to 133.2 (using 2015 as a base line of 100).

Based on the above, we would propose an increase of Tariff 1 and 2 by 20%, and a further increase of Tariff 3 and 4 of 20% (giving a total 44% increase on these tariffs).

#### **Driver Licensing Procedure**

As stated above, we believe the current driver licensing procedure to be outdated, requiring drivers to complete difficult locality tests disregarding driver's access to Satnav and sophisticated booking systems with embedded Satnav or maps. The current licensing procedure requires potential drivers to obtain a DBS certificate for which their ID must be checked by the local authority. This ID check cannot begin under current licensing rules until the driver has completed licensing tests, dates for which are often significantly delayed from the point of application.

The DBS process takes a significant length of time from the point the application is completed. By allowing operators to complete and verify the ID of applicants a significant amount of time could be saved in the driver badge process. This would help alleviate the current driver shortage across the region and allow for more successful applications.

The government best practice guide for Taxi Driver Licensing recommends that licensing tests and procedures for procuring badges should not provide unnecessarily high barriers to entry. As such, we would propose that the current driver licensing policy is reviewed to improve speed and simplicity for potential drivers.

#### **Representation with Licensing Authority**

We have noted recently that a local taxi association was afforded a number of meetings with senior figures at the licensing authority to discuss potential policy changes. As a company we have been excluded from this association due to our size. We would like to request that going forward we have similar access to meetings with senior members of the Licensing Authority team.

## Consultations

Fri 12/11/2021 11:39

To: Licensing Mailbox <Licensing@northumberland.gov.uk>

Cc:

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

I would like to formally lodge my objections regarding NCC new policies.

The change of the zones in the county are unnecessary and I personally think it would have an impact on passenger safety and I feel it would seriously damage the income of the smaller businesses as it would allow the larger companies to flood the market with cars especially at the busy times therefore I am totally against this .

I appreciate that the council are under pressure to reduce the carbon foot print but I feel putting a struggling trade under financial pressure is not the way forward many are under a massive financial burden due to the pandemic imposing vehicle restrictions now will force many operators to lose their livelihoods as they are already struggling many living week to week I agree with all new licences adhering to euro 6 but feel the 8 year age restriction will not allow operators to get their businesses back on a even keel and may force many out of the trade.I agree with Euro 6 on new applications but feel the upper age limit needs to be extended which could easily enforced by assessing the standard of the vehicle when testing . A 10 year old vehicle that is properly maintained is equally able to do the job as a newer vehicle . Please forward to the appropriate departments

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Good afternoon all Please see attached below feedback we have had from the NPHTA today after we asked them for a legal point of view on the proposed changes in the consultation with regards to vehicles and Zones??

We was advised a 4 week consultation is not long enough to get a fair response from the trade Many Operators/ drivers have not received an email about the consultation?? (this is a legal requirement all parties receive notification) We request you extend the consultation period to between 6 to 10 weeks to give everyone time to one receive notification about the consultation and time to respond???

48 hours instead of 72? You can't rewrite an Act of Parliament!

It's 72 hours for good reason - so proprietors have sufficient time to report damage occurring at the weekend

A consultation period is usually 6 weeks This would also be a good compromise between the 4 and 12 mentioned

Consulting all interested parties meaningfully is a legal requirement - mentioned in the Regulators' Code and also case Law - Sardar and others v Watford 2006

Compromises are also possible on age limits The 4 and 8 year limits are fine No new vehicle should fail to meet Euro 6. Existing vehicles should be allowed to run until 8 years old or another couple of years if already 8 years old.

Having a county-wide zone would deny passengers in outlying areas service as drivers would be required to charge only from the point of hire across a much bigger area and this would not be financially viable.

The original "prescribed distance" was 5 miles from the GPO This was changed to district boundary but becomes absurd when districts are the size of counties!

We look forward to your response



Re: Northumberland County Council Hackney Carriage and Private Hire policy Consultation 2021

Thu 11/11/2021 14:37

To: Licensing Mailbox <Licensing@northumberland.gov.uk>

Cc:

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

I agree with the euro 6 car policy but not the 8year length of time frame the car can stay on the road the time frame is not long enough.I think making 1 zone for all of us is a really bad idea we as an industry is really struggling and it's hard enough to make a living just in berwick and allowing everyone else coming to our zone would just make it even harder.

Yours hopefully

On Friday, October 22, 2021, 10:43 am, Licensing Mailbox <Licensing@northumberland.gov.uk> wrote:

Good Morning,

*Northumberland County Council Licensing Department are currently seeking views in relation to the Northumberland Hackney carriage zones. There are currently 6 zones within Northumberland which are based on the old boundaries of the former district Council's.*

*It is also proposed that a new policy be implemented in relation to age of vehicles licensed as hackney carriage and private hire vehicles. All vehicles for new licences shall be 4 years old or younger. This means the EURO 6 emissions standard applies to all new licences. Licences will not be renewed once the vehicle is over 8 years old.*

*It is further proposed to amend current policy to state that licensees should report details of any accidents to the Council within 48 hours instead of current 72 hours.*

*A condition to be added to hackney carriage and private hire vehicle licences to require a notice be displayed in all licensed vehicles providing details of how to make a complaint.*

*The following statement be added to the policy.*

*Due consideration will take place as to whether a referral to the DBS is made when it is thought that:*

- an individual has harmed or poses a risk of harm to a child or vulnerable adult;*
- an individual has satisfied the 'harm test'; or*
- received a caution or conviction for a relevant offence and;*
- the person they are referring is, has or might in future be working in regulated activity; if the above conditions are satisfied, the DBS may consider it appropriate for the person to be added to a barred list.*

*Proposed additional condition*

*Condition for all vehicles to require all proprietors, directors and partners to have an annual basic disclosure from the DBS and to advise the licensing authority of any change in directors or partners*

*Proposed additional condition.*

*Condition for operators of granting an operator licence, we will require a register is kept of all staff that will take bookings or dispatch vehicles*

*Proposed additional condition.*

*A standard condition to be attached to a Private Hire Operator's Licence: -*

*The use of a driver who holds a PCV licence and the use of a public service vehicle (PSV) such as a minibus to undertake a private hire vehicle booking should not be permitted without the informed consent of the booker.*

## Hackney carriage consultation 2021

Sun 14/11/2021 21:09

To: Licensing Mailbox <licensing@northumberland.gov.uk>;

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Evening,

In response to your 2021 policy consultation, I would like to raise my concerns about your proposed changes.

Removal of the current 6 zones within Northumberland would create a situation where it would not be financially viable for drivers to serve areas outlying the towns as they would only be able to charge from point to point and not cover the cost of dead mileage. Passengers in these areas would therefore be denied service and may be put at risk.

The proposal of vehicle age limits is something I disagree with strongly, although I agree with implementing the Euro 6 policy. If a vehicle meets this standard and passes the required MOT standard and Council compliance test it should not matter what age it is.

Your proposal to reduce the reporting of any accident to the Council within 48 hours would prove impossible over weekends or holiday periods. Currently it is almost impossible to contact the licensing department at any time!

Details of how customers can make a complaint is already displayed in Hackney Carriages on the blue windscreen/dashboard card supplied by the council with all relevant License documents, so I don't understand why this is in your proposed changes.

I have no objections to any of the other proposed changes regarding DBS checks and PCV licences.

Regards,

Hackney Carriage Licence Holder

## Consultations

Sun 14/11/2021 20:15

To: Licensing Mailbox <licensing@northumberland.gov.uk>

Cc:

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi thank you for recent comms

After filling in consultation i am also emailing my view :

1/ the abolishment of Northumberland taxi zones should not go ahead..It will prove a nightmare to police this never mind the health n safety concerns. It will create a Free for all with cars travelling all over Northumberland this will increase the carbon footprint not reduce it..

2/ At this time i think a fare increase for 4 seaters is not nessacsary in the current covid Recovery this would play into the hands of larger companies .tho i do think 5 6 7 and 8 seaters could b increased as at the moment the difference is not viable as the extra cost of purchase n running cost is much higher.

3/ I strongly object to the proposed age limits. This would b a bit of a kick in the .... in the post covid recovery this is a heavy financial burden to place on drivers n operators as many barely made it through and are still struggling. Euro 6 will come in eventually as fleets are updated naturally more time must given for drivers to renew there cars

Thank you

1.

Sent from Sky Yahoo Mail on Android

Euro 6

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Fri 19/11/2021 17:53

To: Licensing Mailbox <licensing@northumberland.gov.uk>

Cc:

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi with regards to my response via the Ncc Link.

Please also find my reasons below

I strongly disagree on the vehicle proposal of Euro 6 and 4 years on and 8 years off. Up in the Berwick area we are the main and one of the only operators to run in our fleet wheelchair access minibuses of up to 8 seats or 7 seats plus a wheelchair. We currently operate all of the wheelchair home to school transport in the Grove School as well as routes to Barndale House. As well as this we provide services for the NHS and all the local care homes in the area as well as lots of private customers. I did until recently run a fleet of Euro 4 commercial vehicles on this side of the business due to the cost of a WA minibus being so high. We do not finance our vehicles we tend to buy them this way if for any reason business quietens off we don't need to pay finance. After winning signing and agreeing to another 5 years of SEN contracts it was stated that all new contracts had to be Euro 5 emissions on any vehicle undertaking a contract of Home to School transport within 6 months of winning the contract.

After recovering from this massive impact in business because of Covid I feel that we are slowly coming out the other side. At this point I must stress that if my vehicles were on finance throughout Covid I would not now be in business as I couldn't afford the finance payments while the vehicles were stood up. My worry is we didn't foresee see this there for if this happened again I just couldn't survive on school contract work only as these buses do a lot of private wheelchair work as well.

If I have to buy vehicles that are 4 years old I would need to finance them as I couldn't afford to replace 10 minibuses (if I was accepted I would need 10 minibuses on finance which I know I won't be accepted for as in the current market a 4 year old average 8 seat WAV costs approx £25k each that would be up to £250k to replace.

I have just recently complied with the NCC Home to School transport team and bought 5 newer Euro 5 emissions minibuses in which I was and still am hoping to get the full 5 years contract out of „I still need to upgrade another 5 minibuses to Euro 5 from Euro 4.

At the minute 10 of my 12 vehicles are wheelchair access. As far back as I can remember, because of the lack of WAV the rules were any new Hackney carriages that were put on the road had to be WAV. I believe apart from another handful of wheelchair plated cars we are the only operator within the Berwick area that offer this service. With the current market of the costs to buy a used vehicle so high due to the large demand of new cars builders awaiting parts from manufacturers I also believe if you bring the 4 years old rule in to effect you will lose a lot of operators and taxi drivers because the work just isn't there to justify a vehicle being profitable if it can only be used up to 8 years old.

If my 8 seat WAV or any of my WAV were needing replaced these used to cost approx 15% more than a normal vehicle without conversion. With the prices hiking and the large demand in the last 2 years a WAV now costs approx 50% more than a normal vehicle if the same type.

I therefore am hoping that there can be some sort of exemption for WAV to possibly require Euro 5 level or an exemption for Home to School transport. Looking at the amount of tenders coming in every day all over the County it seems like NCC are struggling with getting operators to fulfil school contracts at the minute and all through Covid as there has been so many operators handed plates back and finished operating due to lack of business. If there can be an exemption then this in turn would then stand us a

better chance of survival and being able to operate the school transport routes required . This may also lead to other operators buying WA vehicles which in turn would help the communities and the customers we can't currently help if we are busy on other contracts if WAV could stay at Euro 5 or at least the commercial vehicles such as 8 seat minibuses

At the minute I believe that the requirements are Euro 5 for a car and Euro 4 for a commercial vehicle. Could this not be upgraded to Euro 6 for a Car and Euro 5 for any commercial or WAV. I also believe the EURO 6 are getting pushed by DFT statutory standards which is fine but can you explain the 4 year old rule and 8 year old rule please as I was led to believe this is about emissions standards vehicle age shouldn't come into it as long as the emissions are met like previous . I myself have older vehicles that are a lot cleaner inside and out than some new taxis that are on the road .

I also strongly disagree with the zones to be changed to 1 zone.

Excess travelling to other zones to ply for work will increase the emissions and carbon footprint in a lot of cases . I also feel that customers will get ripped off if drivers don't know the area they are working in and following sat navs as sometimes they can lead you down wrong roads or dead ends etc . I truly believe each zone should stay as they are to avoid a lot of issues like this that may arise.

The knowledge test will also take a lot more tuition of a much larger area that will in turn take a lot more time for drivers to get badges and possibly more paper work for the NCC if new drivers fail a lot more

I look forward to hearing from you in due course

Kind regards

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Sent from my iPhone

Fw: Consultation

Jane Gunby <Jane.Gunby@northumberland.gov.uk>  
on behalf of  
Licensing Mailbox <Licensing@northumberland.gov.uk>

Tue 11/16/2021 9:20 AM

To: Laura Elliott <Laura.Elliott@northumberland.gov.uk>

Licensing Team  
Business Compliance & Public Safety Unit  
Housing and Public Protection Service  
Northumberland County Council  
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**From:** f  
**Sent:** 12 November 2021 20:10  
**To:** Licensing Mailbox <[licensing@northumberland.gov.uk](mailto:licensing@northumberland.gov.uk)>  
**Subject:** Consultation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Consultation 2021  
Zones and vehicles age

Personally I think this is unfair and a risk to the public !!!!  
Many towns throughout Northumberland have Hackney drivers who work the ranks only and if the Zones was to open up they could be driven out of business by the bigger companies who flood the ranks!!!Weekends you will see cars travelling to the Zones that have the most work and this will be a risk to the public having taxis who are not from the area and not knowing the streets etc, and on the flip side they will leave the area they have come from with no taxis!!!! Members of the public left without taxis!!!  
The police are even saying Don't get into a taxi Not from your area!!!!  
Having a county-wide zone would deny passengers in outlying areas service as drivers would be required to charge only from the point of hire across a much bigger area and this would not be financially viable

Euro 6

The trade is still trying to recover from the pandemic and to make changes like this could send many companies out of business!!!  
I agree that we need to improve the carbon footprint, many taxis registered in Northumberland are older cars ?? If this is the case it would take many Operators years to upgrade their fleets

However many will be looking to improve their fleet over the next few years and hopefully

many will look at Euro 6 cars!!! ( if they want to help carbon footprint)

This will take time and finances

If your vehicle is of Euro 6 standard you should be able to keep the car on the road longer than 8 years old. 10 years + would help long term and help financially.

Anyone who is replacing an existing taxi should be looking to bring them upto Euro 6 starting in 2025?

One way to help is replacing cars should have less than 30000 miles on the clock!!! This way most would be newer vehicles and hopefully be Euro 6!!!.

The trade needs time to recover and this may take 3/5 years.

Will the council make Grants available to help towards buying Electric cars??

This may encourage drivers to upgrade their fleets.

Re: Northumberland County Council Hackney Carriage and Private Hire policy  
Consultation 2021

Thu 18/11/2021 14:15

To: Licensing Mailbox <Licensing@northumberland.gov.uk>

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I wish to register my objection to the introduction of the proposals for removing the zones in the Northumberland area as this will only benefit larger operators with multiple cars and drivers. This will be severely impacting on the smaller and independent operators and preventing them earning a living.

Especially after the 18 month pandemic we are just starting to recover from.

I also wish to object to the proposals for imposing age limits on the vehicles at this point, for the same reasons that we are not in a good financial position after just starting to exit the Covid 19 pandemic.

I personally lost 75% of my business turnover when the pandemic hit and the only income was from a school transport contract I have with NCC.

I still had overheads to cover which included vehicle finance, Taxi plate licences, insurance and vehicle running costs.

May I also point out that the council have not given the correct amount of time for the consultation. By law consultation periods should be between 8 to 12 weeks and not the 4 weeks Northumberland County Council imposed on us.

Regards

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**From:** Laura Elliott <Laura.Elliott@northumberland.gov.uk> on behalf of Licensing Mailbox <Licensing@northumberland.gov.uk>

**Sent:** 22 October 2021 10:40

**Subject:** Northumberland County Council Hackney Carriage and Private Hire policy Consultation 2021

Good Morning,

*Northumberland County Council Licensing Department are currently seeking views in relation to the Northumberland Hackney carriage zones. There are currently 6 zones within Northumberland which are based on the old boundaries of the former district Council's.*

*It is also proposed that a new policy be implemented in relation to age of vehicles licensed as hackney carriage and private hire vehicles. All vehicles for new licences shall be 4 years old or younger. This means the EURO 6 emissions standard applies to all new licences. Licences will not be renewed once the vehicle is over 8 years old.*

*It is further proposed to amend current policy to state that licensees should report details of any accidents to the Council within 48 hours instead of current 72 hours.*

*A condition to be added to hackney carriage and private hire vehicle licences to require a notice be displayed in all licensed vehicles providing details of how to make a complaint.*



## Re: Northumberland County Council Hackney Carriage and Private Hire policy Consultation 2021

Sun 14/11/2021 13:38

To: Licensing Mailbox <Licensing@northumberland.gov.uk>

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Afternoon,

In response to your 2021 policy consultation, I would like to raise my concerns about your proposed changes.

Removal of the current 6 zones within Northumberland would create a situation where it would not be financially viable for drivers to serve areas outlying the towns as they would only be able to charge from point to point and not cover the cost of dead mileage. Passengers in these areas would therefore be denied service and may be put at risk.

The proposal of vehicle age limits is something I disagree with strongly, although I agree with implementing the Euro 6 policy. If a vehicle meets this standard and passes the required MOT standard and Council compliance test it should not matter what age it is.

I would also like to point out that during 2020 I bought two replacement vehicles for my hackney plates BT22 and BT43. I was told by the licensing department they could not be used as they were Euro 5 standard. I was forced to change them both for Euro 6 vehicles at considerable cost only to see many Euro 5 vehicles being newly licensed across the whole region after this point.

Your proposal to reduce the reporting of any accident to the Council within 48 hours would prove impossible over weekends or holiday periods. Currently it is almost impossible to contact the licensing department at any time!

Details of how customers can make a complaint is already displayed in Hackney Carriages on the blue windscreen/dashboard card supplied by the council with all relevant License documents, so I don't understand why this is in your proposed changes.

I have no objections to any of the other proposed changes regarding DBS checks and PCV licences.

Regards,

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From: Laura Elliott <Laura.Elliott@northumberland.gov.uk> on behalf of Licensing Mailbox <Licensing@northumberland.gov.uk>

Sent: 22 October 2021 09:43

Subject: Northumberland County Council Hackney Carriage and Private Hire policy Consultation 2021

Good Morning,

*Northumberland County Council Licensing Department are currently seeking views in relation to the Northumberland Hackney carriage zones. There are currently 6 zones within Northumberland which are based on the old boundaries of the former district Council's.*

*It is also proposed that a new policy be implemented in relation to age of vehicles licensed as hackney carriage and private hire vehicles. All vehicles for new licences shall be 4 years old or younger. This means the EURO 6 emissions standard applies to all new licences. Licences will not be renewed once the vehicle is over 8 years old.*

*It is further proposed to amend current policy to state that licensees should report details of any accidents to the Council within 48 hours instead of current 72 hours.*

# Response to taxi & private hire consultation 22 october 2021

Wed 17/11/2021 11:35

To: Licensing Mailbox <Licensing@northumberland.gov.uk>

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

16.11.21

Dear Licensing

In response to the proposed amendments to the Hackney Carriage and Private Hire Licensing Policy.

Can all members please bear in mind since the last consultation we have had a global pandemic which you are all aware brought the trade to its knees and will take many years to recover including many drivers /operators taking out things like bounce back loans etc to recover which were set to be repaid over many years which even if new vehicles were purchased, they would be removed by yourselves before the likes of bounce back loans were paid off. These were all brought in by the government to help businesses' bounce back not go under which is what many will be pushed to !

Points from previous consultation which are more relevant now !

## 1.New vehicle licences

A 4 year vehicle age policy is a bit steep considering how expensive cars are these days, older vehicles should be allowed to be licensed as long as they meet EURO 6 emission standards due to technology out there that can lower emissions drastically.

As the policy states at this present moment EURO 5 for passenger cars and EURO 4 for commercial vehicles why cant it be upgraded to EURO 6 for passengers cars and EURO 5 for commercial vehicles due to the huge difference in cost of commercial vehicles.

## 2. Existing Vehicles

If a vehicle is fit for purpose and is tested 3-4 times per year surely they are safer than most other vehicles on the road , Northumberland have probably one of the safest taxi fleets in the UK due to strict testing and more than just an annual test. EURO 5 standard was only brought in in April 2017 if this policy amendment goes ahead there will be people who will still have outstanding finance and unable to use their vehicles some vehicles were purchased over a longer period due to higher costs.

This could cause a huge amount of financial strain on an already strained trade leading to stress, anxiety and depression the LA needs to bare this in mind when adding huge financial burdens onto drivers & operators.

Allow vehicles already licensed to stay on as nearly all drivers and operators replace their vehicles when required. Northumberland does not have a bad taxi fleet due to the amount of testing and enforcement we have but we can still all do our bit for the environment at the same time.

Other counties have age limits but not as extreme as off at 8 year old even Transport for London our capital city are reducing theirs from 15 yrs gradually down to 12 ,BUT if you licence a EURO 6 you get the 15 years again .

3. The cost of wheelchair accessible vehicles is astronomical and this must be taken into consideration bring in a EURO 5 for new licences but allow longer to run due to cost as no one will buy any and Northumberland will never meet its criteria for Disability Transport for the public of the county.

4. Electric vehicles should be exempt from costs of licencing to encourage them in the future the infrastructure is not anywhere where it should be for them to be a viable option yet, but should not be exempt from the age limits as they still have all of the same running gear and can wear out the same as any other car we don't have enough information

yet as they have not been tested enough to say they should be exempted for the emission side of the electric vehicle research is way off what it should be to say they are zero emissions.

## **5. Removal of zones**

The amount of out of area taxis/private hire vehicles working in Northumberland is bad enough without letting go of the only control the county has on the taxi trade .

Weekend are spent keeping Newcastle / North Tyneside vehicles off our ranks let alone making the situation a bigger issue where no one has any idea who is who at the moment there is a little bit of customer safety but remove the zones and that will disappear .

ie Jenny gets into a taxi on Blyth rank but the driver normally drives in Berwick she leaves her bag in the car her first reaction will be to contact the taxi companies in the local area she would never think that a driver/ vehicle from Berwick would have picked her up.

This example could also be the case if god forbid something happened to her while in the vehicle !

Most drivers & operators are aware of who works in the local area but couldn't help if this was opened up.

Passenger safety must be at the forefront of everything you & the trade do.

## **In short**

Vehicles that are more than fit for purpose will be removed and will have to be disposed of (not great for the environment)

Vehicles still on finance removed.

Drivers working more hours to buy BRAND new vehicles to get the full length of life {8 years }

Jobs lost as not everyone can buy BRAND new or under 4 years old still in excess for £20,000 for cars and £45,000 for commercial and climbing.

Consideration needs to be given to mental health as the strain this will cause could cause anxiety, depression and other health issues these need to be highly considered.

Other job losses within the trade not just drivers i.e. office staff, mechanics, passenger assistant's due to paying huge amounts of finance .

If we are to reduce our carbon footprint this can be done in other ways not putting the huge financial burden on this trade alone vehicles can be adapted to reduce the emission output these must be considered.

Safety of passengers must be the biggest consideration where the zones are concerned Northumberland is massive !

**Other options must be looked at we all want to help the environment , stay safe and in business but at what cost !**

## Car age

Tue 16/11/2021 10:50

To: Licensing Mailbox <licensing@northumberland.gov.uk>

Cc:

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please accept this email as my opposition to the new proposal for age restrictions on cars, I think an age restrictions of 8 years is too short, myself as an independent operator would be constantly in debt with car finance payments, I also disagree with the opening of zones, I think this would cause cars/ drivers from out of the area they are licenced in at the minute flooding other zones therefore customers would not receive a good service from local drivers,

Thanks

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