

NORTHAMPTON BOROUGH COUNCIL

Licensing Committee

Your attendance is requested at a meeting to be held at the The Jeffrey Room, St. Giles Square, Northampton, NN1 1DE. on Tuesday, 8 May 2012 at 6:00 pm.

**D Kennedy
Chief Executive**

AGENDA

1. Apologies
2. Minutes
3. Deputations / Public Addresses
4. Declarations of Interest
5. Matters of Urgency which by reason of special circumstances the chair is of the opinion should be considered
6. Hackney and Private Hire Age Limit and Engine Capacity and Associated Amendments
Report of Director of Customers and Communities (Copy herewith)
7. Exclusion of Public and Press
The Chair to Move:
“that the public and press be excluded from the remainder of the meeting on the grounds that there is likely to be disclosure to them of such categories of exempt information as defined by section 100(1) of the Local Government Act 1972 as listed against such items of business by reference to the appropriate paragraph of Schedule 12a to such act.”

Public Participation

Members of the public may address the Committee on any non-procedural matter listed on this agenda. Addresses shall not last longer than three minutes. Committee members may then ask questions of the speaker. No prior notice is required prior to the commencement of the meeting of a request to address the Committee.

SUPPLEMENTARY AGENDA

Exempted Under Schedule, 12A of L.Govt Act 1972, Para No: -

<TRAILER_SECTION>
A6837

Public Participation

Members of the public may address the Committee on any non-procedural matter listed on this agenda. Addresses shall not last longer than three minutes. Committee members may then ask questions of the speaker. No prior notice is required prior to the commencement of the meeting of a request to address the Committee.

Appendices

3



NORTHAMPTON
BOROUGH COUNCIL

Ward: N/A

Name of Group:	LICENSING
Meeting Date:	8th May 2012
Directorate:	Public Protection
Head of Service:	Steve Elsey
Corporate Director	Julie Seddon

Report Title	Hackney and Private Hire Age Limit and Engine Capacity and Associated Amendments
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1. Recommendations

That the report be considered and determined. Various recommendations and the rationale behind these derived from the options expressed below are contained in 7.1

2. Summary

Currently the Council will not licence a Hackney Carriage if its age is greater than three years from the date of first DVLA registration.

There are no similar conditions on licensing Private Hire Vehicles.

Consultation and Research was carried out to:

- Determine whether the introduction of age limits for both Hackney Carriages and Private Hire vehicles are reasonable in the interests of public safety.
- Determine whether an increase in the engine capacity of Private Hire Vehicles from a minimum of 1400cc to 1600cc is reasonable.
- Determine whether faults found on Hackney and Private Hire vehicles are age related and whether they could be avoided by introducing such an age limit or an alternative solution.

3. Report Background

At the Licensing Committee meeting of the 27th September 2011 a decision was made for consultation and that research be carried out into the merit of introducing

- 1) An age related policy in respect of Hackney Carriage and Private Hire vehicles

and

- 2) To consider increasing the current engine capacity of Private Hire Vehicles from 1400cc to 1600cc with associated exemptions.

The Council's current policy with regard to Hackney carriages, introduced in October 1997, is that they must be less than 3 years old when licensed for the first time.

There is no upper age limit placed on these vehicles thereafter.

Private Hire Vehicles are usually "normal" vehicles which are representative of the private car fleet e.g. medium/large saloon cars, people carriers with up to 8 passengers capacity and some limousine type vehicles for specialist hire.

There is currently no lower or upper age limit attached to these vehicles.

The current minimum engine capacity for a Private Hire vehicle is 1400cc as long as the vehicle complies with the other technical specifications.

When considering adopting an age limit policy, the determining factors that influence local authorities are:

- The interests of public safety
- Reducing pollution/emissions
- Establishing commonality across the trade/improving the overall standard of the fleet
- Ensuring comfort and reliability to fare paying passengers.
- The promotion of quality of life and accessibility

Proposal upon which the Consultation was based

1. A Private Hire Vehicle licensed for the first time will be no more than three years old from the date of first registration. This would bring Private Hire Vehicles in Line with the current lower age limit for Hackney Carriages.

Providing the standard is maintained in line with the Technical Specifications for Private Hire Vehicles, Hackney Carriages or Private Hire Vehicle would be licensed for a further five years.

Hackney Carriages or Private Hire Vehicle would then not be able to renew that licence once it is more than eight years old from the date of first registration.

2. The engine capacity of Private Hire Vehicles would be increased from a minimum

1400cc to 1600cc.

Exemptions

1 Prestige vehicles

No definitive list of models that constitute a prestige vehicle can be provided, however examples would be Bentley, Rolls Royce and vehicles currently licensed as chauffeur driven vehicles. Each vehicle would be considered on its own merits. A prestige vehicle would not be used for everyday private hire usage and only available for hire to undertake specific events or contracts where the use of the vehicle is necessary for the running of the vehicle owner's business. A prestige vehicle would also have to meet the existing "Exceptional Condition" criteria below.

2 Exceptional Condition

Vehicles of exceptional condition would still be considered for a licence but, should a vehicle fail its first test when over eight years old, it cannot then be considered as being in 'exceptional' condition.

To determine exceptional condition the following guidelines would be applied:

- a) The vehicle must pass the Council vehicle inspection
- b) The bodywork should be in near perfect condition with no signs of panel age deterioration, dents, scratches, stone chips or rust or any other abrasions that may detract from the overall appearance of the vehicle
- c) The general paint condition should not show signs of fading, discolouration or mismatching that may detract from the overall appearance of the vehicle.
- d) The interior trim, panels, seating and carpets etc should be in excellent condition clean, free of damage and discoloration
- e) The vehicle service record can be used as supporting evidence of exceptional condition in that a vehicle of exceptional condition would normally be expected to demonstrate regular servicing and maintenance in accordance with the manufacturer's service specification
- f) The vehicle to be in excellent mechanical condition and in all respects safe and roadworthy with no signs of corrosion to the mechanical parts, chassis, underside or body work
- g) The boot or luggage compartment to be in good condition, clean and undamaged
- h) Low mileage – Hackneys and Private Hire vehicles generate higher mileages than domestic vehicles. In considering low mileage in this context we would view a private hire vehicle or hackney carriage to not have exceed 15,000 miles for a petrol engine and 20,000 miles for a diesel engine per year since the date of its first registration

If an age limit is introduced it is recognised that this may affect vehicle owners who currently license vehicles that would not qualify under the proposal. In order to

minimise any impact, the introduction of an age limit would only relate to new license applications, with all existing licensed vehicle owners being allowed to license their vehicles for a further two years. So for example a vehicle which is currently 12 years old could be licensed for a further two years as long as it passes the MOT test.

3 Hybrid vehicles and those with clean alternative fuels

4 Vehicles adapted to facilitate wheelchairs and disabled persons in general

5 Disabled drivers who have had substantial adaptations made to their vehicle

4. Consultation

The consultation commenced on the 5th December 2011 and closed on the 29th February 2012.

More than 1000 letters were sent out to the trade.

The consultation was also publicised and made available to the general public.

A total of 165 separate responses were received.

114 respondents were owners, drivers and / or operators.

Of the trade responses, 35 were from Hackney Carriage owners, 27 Hackney Drivers, 44 Private Hire owners, 57 Private Hire drivers and 9 Private Hire operators. (Please note that some of these responses were a combination of the above which is why this total adds up to more than 114).

One report was also received from a Hackney Driver which is included as Appendix 3b.

51 respondents were members of the public.

All respondents provided in excess of 981 free comments; including details about specific proposals and concerns about potential impacts that were considered to affect various sectors of the community (Full details of the consultation results and key findings can be found at Appendix 1).

Copies of the background information, the questionnaire used and full consultation responses including any reports are found at Appendix 3.

5. Research

Alongside the consultation, which is predominantly opinion based, evidence-based research was also undertaken to determine any correlation as to whether older vehicles are more prone to mechanical failure and therefore more likely to impact upon public safety.

MOT test reports were analysed for all Hackneys and Private Hire Vehicles which were tested between November 25th 2011 and February 29th 2012 at the two Northampton Borough Council contracted MOT testing centres (Jacksons MOT Centre and NCS MOT Centre).

A total of 389 reports of all the tests undertaken between 25th November 2011 and 29th February 2012 were received. The reports were made up of 86 Hackney Carriages and 303 Private Hire vehicles.

On compiling this report there are currently a total of 720 plated vehicles in Northampton, consisting of 133 Hackney carriages and 587 Private Hire vehicles.

The test reports are representative of 54% of all licensed vehicles (64.5% of all licensed Hackneys and 52% of all Private Hire Vehicles).

For full details and Key findings of the research please see Appendix 2 (Hackney Carriage and Private Hire Vehicle Age Limit – MOT Inspection Findings Report)

6. Any Relevant Policies

Technical specifications for Private Hire Vehicles

Technical Specifications for Hackney Carriages

7. Options and Evaluation of Options: Introduction of Age Limit, Engine Capacity and Associated Amendments

Theme	Option 1	Option 2	Option 3	Option 4
Introduction of an Age Limit	<p>No change</p> <p>Remain with the lower limit for Hackneys only</p>	<p>Accept the proposal</p> <p>The majority of respondents were against introducing the proposal. There is little evidence to suggest that this proposal would make any significant positive impact. The financial consequences placed on the trade and the potential equality impact would have to be seriously considered by the committee before taking this option.</p>	<p>Remove the 3 year lower limit on Hackneys</p> <p>The current lower limit on Hackney carriages creates disparity between Hackney and Private Hire vehicles which is difficult to justify. There is no evidence to support its continued use. There has also been an inflation of prices for Northampton plated Hackneys due to this limit.</p>	<p>Introduce a policy which aims to ensure that the overall condition is kept high irrespective of age.</p> <p>The most common factor through the consultation exercise has been that it is the overall condition on a day to day basis of the vehicle rather than its age. The Licensing Department could utilise this policy to ensure standards are kept high by using penalties for those that do not meet the standard</p>
Increasing Engine Capacity/Exemptions for Hybrids	<p>No change</p> <p>If this option was taken, Hybrids and other alternative fuel vehicles would already be included. There are approximately 12 sub 1600cc vehicles, all of which comply with the current technical specifications for Private Hire vehicles</p>	<p>Increase to 1600cc with Exemptions for Hybrids</p> <p>The majority that commented were against this and argued brake horse power is more important, and that the efficiency of engines should be considered. The majority were in favour of exemptions for vehicles such as hybrids. There is no clear evidence to support an increase in the engine capacity.</p>	N/A	N/A
Introducing 3 MOT tests per year (should no Age Limit be introduced)	<p>No change</p> <p>Remain at two per year.</p>	<p>Increase to three per year</p> <p>This would again have a financial impact on the trade. Also, introducing three tests per year would limit the Licensing Departments' power to undertake spot checks on vehicles. A key theme from respondents throughout the consultation was an increase in spot checks. There would also be a significant impact on the Licensing Department in order to administer the increase in testing.</p>	<p>Reduce to one per year</p> <p>Evidence from MOT test reports would suggest that the number of faults identified on the majority of vehicles irrespective of age requires at least two MOT tests per year be carried out.</p>	N/A

Theme	Option 1	Option2	Option 3	Option4
Removing the 6 month requirement for a Council Test on a new vehicle in its first year	No Change Maintain the current requirement for a 6 monthly Council test.	Remove the current requirement While the majority of respondents ticked yes to this answer, many comments were against removing this requirement. The key argument being that a vehicle can cover considerable mileages within 6 months, and without proper maintenance, parts such as tyres, brakes, lights etc can become defective. The six monthly tests at least ensure a standard is maintained.	N/A	N/A
Exemptions from an age limit or engine capacity restriction for vehicles adapted for wheelchairs	No Change if no age limit or engine capacity changes are introduced.	No exemptions for adapted vehicles This would reduce the number of wheelchair adapted vehicles or those vehicles capable of carrying wheelchairs. Many disabled persons use adapted or capable vehicles as a primary source of transport.	Allow exemptions for adapted or capable vehicles. This would maintain the current level of accessible vehicles. Some respondents felt that allowing exemptions could be seen as discriminatory against disabled people if an age limit is introduced on factors including public safety and roadworthiness	N/A
Exemptions from an age limit for vehicles in exceptional condition	No change Some vehicles are currently licensed to undertake specific types of work e.g. chauffeur driven vehicles, Wedding cars. This practise could continue for these types of vehicles only. They do not undertake day to day Private Hire/Hackney duties.	No exemptions. This would prevent the types of vehicles often used for specific events from being used and will impact on those businesses.	N/A	N/A

7.1 Recommendations and Rational

After careful analysis of the evidence collected the following recommendations are made;

Recommendation 1

That the Licensing Committee direct the Licensing service to review and develop its existing policy in relation to Hackney Carriage and Private Hire vehicles to ensure that the condition of vehicles, internally and externally are maintained to a high standard and that the policy includes a system of penalties for those that do not meet the required standard.

The most common factor that has been identified from the consultation and the research undertaken is that it is not the age of the vehicle that determines its safety or roadworthiness. Rather it is the condition the vehicle is kept and maintained on a day to day basis. It is also the overall condition of the vehicle that contributes to a perception of unroadworthiness and a poor standard of vehicle. It is clear that many in the trade feel that to implement an age policy discriminates against those who maintain their vehicles to a higher standard even though they may not be new vehicles, while some who have a newer vehicle do not keep their vehicle to a similar standard. By determining a process which penalises only those that do not comply with requirements is fairer and in line with other approaches to enforcement across the Public Protection Division.

Recommendation 2

That an age limit for either Private Hire or Hackney Carriages is not introduced and the current three year lower limit associated with Hackney Carriages is removed.

We have no clear evidence that indicates there is justification that an age limit in itself would make any positive impact in relation to public safety. If this recommendation is not accepted it would place a severe financial burden of many individuals and businesses across the trade. It could also impact on customers in the form of fare increases. There is also likely to be a negative equalities impact upon certain groups which would require mitigation in order to try and reduce that impact. Bearing in mind recommendation 1, The Department of Transport has issued a Best Practice Guide to give Local Authorities and Taxi Licensing bodies' guidance as to the regulations that they should operate by. In this guidance they said with regards to Age Limits "it is perfectly possible for an older vehicle to be in good condition. So the setting of an age limit beyond which an authority will not license vehicles may be arbitrary and inappropriate".

While there are still a significant number of local authorities who have adopted a form of age limit, some are deciding to lift the age limit completely or amend them. These authorities include Poole, Halton, Newport (age limit successfully appealed) and Wellingborough

Recommendation 3

That the current policy in relation to Engine Capacity remains at 1400cc and is not increased to 1600cc.

There is no evidence to suggest that 1400cc vehicles that comply with the technical specifications for private hire vehicles and pass the required tests should not be allowed to trade. By not accepting this recommendation at least 12 vehicles will be unable to continue to operate.

By accepting the above recommendations the requirement to decide upon whether to have exemptions for vehicles in exceptional condition; exemptions for Hybrids and other alternatively powered vehicles under 1600cc; or vehicles adapted for wheelchairs become unnecessary.

Recommendation 4

At present it is recommended that the current requirement for 2 MOT tests per year be maintained and not to increase to 3 per year. However, if recommendation 1 is accepted by the Licensing Committee, increasing to 3 MOT tests per year could be a possible penalty for those vehicles that breach any new Condition policy that is introduced that aims to ensure vehicles are constantly maintained to a high standard.

At this time, if this recommendation is not accepted an increased financial burden would be placed on drivers/owner/operators across the board even if they maintain their vehicles to a high standard. It is felt that any possible increase should only be targeted at those who cannot ensure their vehicle is maintained to a high standard at all times. An increase to 3 MOT's per year for all could restrict the ability for spot checks to be undertaken and it is believed that continuing or increasing the number of spot checks undertaken by the Licensing Department within existing resources would be a more effective tool.

Recommendation 5

That the 6 monthly council test for new vehicles remains due to the high mileage that can be covered by licensed vehicles and the possibility of faults occurring at any time.

If this recommendation is not accepted the Committee would be deciding to allow new licensed vehicles to operate for a full 12 months without a requirement to be routinely tested following its initial plating.

8. Resource Implications (including Financial Implications)

The only option with a financial implication to the Council is the option to introduce 3 MOT tests per year. This would result in an increase in administration to levels that would require additional resource for the licensing department and therefore additional budget. It is estimated that a 50% increase in MOT compliance processing would result in an additional budget requirement of approximately £1290 per year. However, this would be offset by the cost to the applicant for the renewal process nullifying any negative financial impact.

9. Consultees (Internal and External)

Internal	Legal Services, Business Change (Corporate Policy and Consultation). Members.
External	Jacksons, NCS, All Hackney and Private Hire vehicle owner/driver/operators licensed by Northampton Borough Council: The General Public, Community Forums

10. Compliance Issues

Legal Comments
<p>By Section 47(1) Local Government (Miscellaneous Provisions) Act 1976 and Section 48(2) Local Government (Miscellaneous Provisions) Act 1976 a District Council may attach to the grant of a Hackney Carriage licence or Private Hire licence such conditions as the District Council may consider reasonably necessary.</p> <p>The considerations and requirements of the Equality Act 2010 which are included within the Equality Impact Assessment below.</p> <p>Members should take great care in making a decision in which there is an absence of logical connection between evidence and the ostensible reasons for the decision.</p> <p>The reasons for any change must display adequate justification.</p>
Crime and Disorder Issues
<p>Under Sec.17 Crime and Disorder Act 1998, we will ensure an increase in safety for the residents of Northampton.</p>
Equality Impact Assessments
<p>An Equality Impact Assessment was undertaken to identify potential impact on protected groups and others prior to the consultation commencing and was reviewed on its completion. The most significant impact affects the trade in general in terms of the financial burden brought on by the requirement to purchase newer vehicles. This could result in unemployment and serious hardship. We have identified that 62% (99) of the owners of Private Hire and Hackney vehicles that fall outside of the original age limit proposal are of an Asian background. This shows that the proposal currently may have a disproportionate negative effect on that group. If an age limit is adopted, mitigation will need to be considered and due regard given to the need to eliminate discrimination and promote equality..</p>
Human Rights Act Implication
<p>Local Authorities must take into account any rights the existing owners may have under Article 1, Protocol 1 of the European Convention of Human Rights,(which entitles every person to the peaceful enjoyment of their possessions)</p>

11. Other compliance issues

None

12. Background Papers

Title	Description	Source
Local Government (Miscellaneous Provisions) Act 1976.	Legislation relating to the regulation and licensing of private Hire Vehicles.	NBC Licensing service
Conditions of fitness and licensing of Private Hire Vehicles.	Department for Transport (Taxi/Private Hire best practice March 2010).	
European Union emission control standards.	Legislation and guidelines relating to emission controls.	
Ford Motor Company research.	Reducing vehicle exhaust emissions.	
NBC Licensing records	Driver and vehicle licensing register.	

Name	Signature	Date	Ext.
Author	Mr B. Edwards	27/4/12	8986
Corporate Manager	Steve Eley	27/4/12	7508
Director	Julie Seddon	27/4/12	

List of Appendices

- Appendix 1 – Report of Consultation Findings
- Appendix 2 – MOT Inspection Report
- Appendix 3a – Full consultation Comments
- Appendix 3b – Hackney Owners Report
- Appendix 3c – Background Information for Consultation
- Appendix 3d - -Consultation Questionnaire
- Appendix 3e – Equality Impact Assessment
- Appendix 3f – Licensing Committee Minutes 27th September 2011

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Northampton Borough Council

Hackney Carriage and Private Hire Vehicle Age Limit and Engine Capacity-Consultation Report

Consultation Results

Report authors:

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1 Executive Summary

This report contains the results to the Hackney Carriage and Private Hire Vehicle Consultation which took place between 5 December 2011 and 29 February 2012.

Key results

- Almost two out of every three respondents disagree that the age of a vehicle is related to its roadworthiness; **(5 out of 5 for owner, drivers and/or operators)**
- Almost two out of every three respondents disagree that the age of a vehicle relates to its safety; **(3 out of 4 for owner, drivers and/or operators)**
- Nearly three out of every five respondents disagree that NBC Licensing Authority should adopt age limits that are common to both Hackney and Private Hire Vehicles;
- If age limits were introduced, two out of every three respondents disagree with the age limits proposed by NBC; **(3 out of 5 for owner, drivers and/or operators)**
- Over half of the respondents agree that NBC Licensing Authority should have exemptions from the age limit for vehicles that are in exceptional condition and have low mileage;
- Two out of every three respondents disagree that Council testing for Hackney and Private Hire Vehicles should be increased from twice to three times per year if an age limit was not introduced; **(4 out of 5 for owner, drivers and/or operators)**
- Nearly half of respondents thought that the minimum engine capacity of Private Hire Vehicles should be increased from 1400 to 1600cc;
- Around a third of all respondents thought that Hackney Carriages and Private Hire Vehicles that are adapted to carry wheelchairs should be exempt from age/engine capacity restrictions;
- Half of all respondents agreed that if the minimum engine capacity of Private Hire Vehicles was increased from 1400 to 1600cc then NBC Licensing Authority should have exemptions;
- Nearly three out of every five respondents agreed that brand new vehicles be exempt from council re-test until 12 months from first DVLA registration; **(2 out of 3 for owner, drivers and/or operators)**

2 Introduction

- 2.1 On 27 September 2011 the Northampton Borough Council Licensing Committee agreed to consult on the feasibility of introducing age limits for Hackney Carriages and Private Hire Vehicles, to increase the engine capacity of Private Hire Vehicles from 1400cc to 1600cc and associated exemptions.
- 2.2 The committee requested that all interested parties, be they in the trade, associated with the trade or members of the public, have the opportunity to have a say.
- 2.3 Completed questionnaires were accepted up to 29 February 2012.
- 2.4 This consultation followed the principles set out in the Council's Consultation Toolkit and industry standard guidance on best practice in consultation.
- 2.5 The results of the consultation are contained in this report. They will be presented to the Licensing Committee 8 May 2012 to consider whether the Council should review its policy in respect of Hackney Carriages and Private Hire Vehicles.
- 2.6 Background Documents
 - Full consultation comments results
 - Hackney owner report
 - Background information
 - Questionnaire
 - Hackney specification
 - Equality impact assessment
 - Consultation questionnaire
 - Licensing Committee Meeting 27 September 2011

These are all contained within Appendix 3

3 Methodology

- 3.1 The consultation was advertised widely through direct mail shots, news releases to the local media and the council website.
- 3.2 Hackney and Private Hire drivers, operators and owners were contacted with consultation information individually. Residents' Associations, Community Forums (including Disabled People's Forum, Pensioners Forum, LGBT Forum, Diverse Community Forum) and other stakeholders were invited to provide feedback on the proposals.

- 3.2 People were able to engage with a range of methods:
- On-line survey
 - Community Forum meetings
 - Questionnaires made available in public locations
 - The consultation proposals and questionnaire were available to download and complete on-line via the Council's website. A named contact and phone line were made available to receive comments/views etc.
 - Engagement with key stakeholders and partners.
- 3.3 Support was made via a dedicated telephone number and email address to maximise involvement and understanding of the proposals
- 3.4 Interim consultation reports containing full details were circulated to Licensing Committee to maximise awareness and action in relation to issues and concerns arising during the consultation.

4 Equalities

- 4.1 An Equality Impact Assessment for this consultation process was undertaken.
- 4.2 People were asked to identify if any individuals or groups would be more positively or negatively affected than others should the proposals be introduced. Comments were also invited on actions that would be required to minimise any likely potential adverse impact identified. See Appendix 3 for details.

5 How will feedback be used?

- 5.1 Results and recommendations will be presented to the Licensing Committee on 8 May 2012 and will be used to inform future policy development.

6 Consultation Results

- 6.1 A total of 165 responses were received in total as at 29 February 2012. More than 1000 letters were sent out to the trade. 114 of those who responded were owner, driver and/or operators. All respondents provided in excess of 981 free comments, including details about specific proposals and concerns about potential impacts that were considered to affect various sectors of the community.
- 6.2 Full consultation results are included in **Appendix 3** and also can be viewed at

http://www.surveymonkey.com/sr.aspx?sm=mFEqvMEFEIngGxDuvngFx_2bGfJ0dFsITxJ_2bjkXL_2fu7Uw_3d.

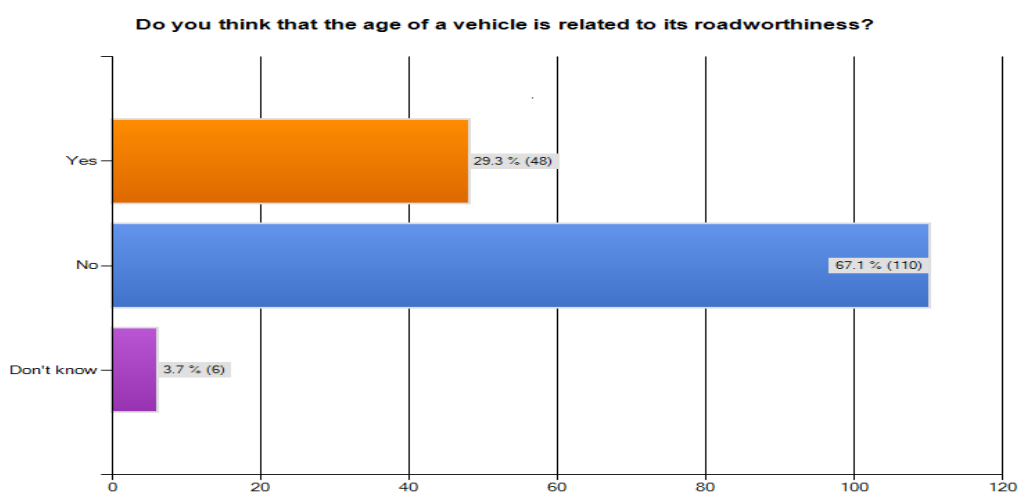
- 6.3 It should be noted that additional activity relating to this consultation was undertaken parallel to this consultation during the period of

consultation in local press, public meetings, etc and that the views expressed during such events are not included in this report.

7 Consultation Analysis

7.1 Below is a summary of response.

7.1.1. Do you think that the age of a vehicle is related to its roadworthiness?



Yes 29.3%-No 67.1%-Don't know 3.7%-Number of additional free-form comments received: 81

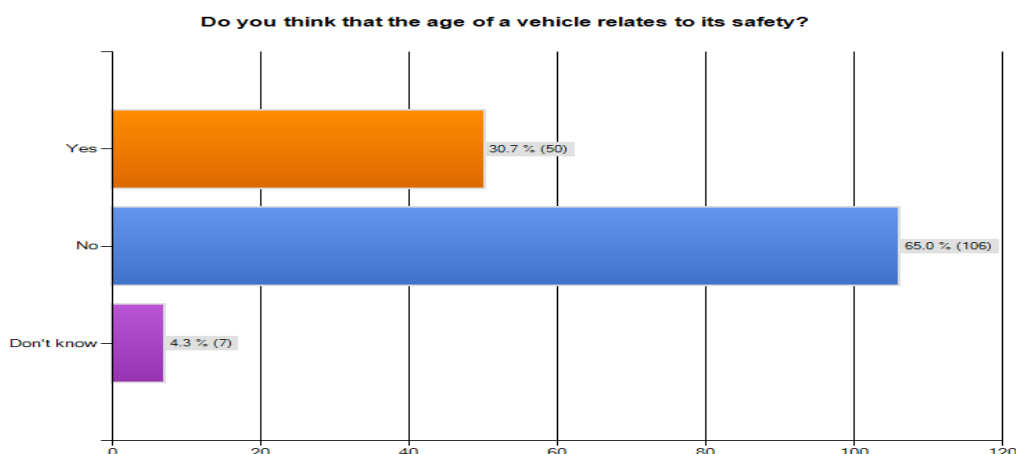
The comments received brought a number of key themes:

- That age alone is not the determining factor
- Regular maintenance and the presentation is what keeps a vehicle roadworthy
- Why replace an older vehicle if it is running well and passes the MOT
- Parts can be replaced so age doesn't matter
- A well kept older vehicle will be more roadworthy than a neglected newer vehicle
- Hackneys are purpose built to last
- Depends on the make and type of vehicle
- Good standard of MOT and council testing will maintain roadworthiness
- It's more about the driver/owners behaviour and how the vehicle is kept day to day
- Each vehicle should be judged on its own merits
- If a vehicle deteriorates that badly it would be taken off the road anyway
- A new vehicle can do very high mileage in just a few months so will need regular maintenance from the start

- If age is limited to roadworthiness why isn't there a legal age limit for all vehicles.

Overall the responses reflected the view that regular maintenance and good testing is the key to a vehicle's roadworthiness. While there was also acknowledgement that parts are liable to stress, wear and fatigue, and this is likely to increase through mileage and age, (a respondent pointed to the motor industry research papers) these defects should be picked up through regular servicing, maintenance and the twice yearly MOT and would therefore have to be replaced or repaired. Many respondents suggested that much of the responsibility to maintain a vehicle's roadworthiness comes down to the day to day care of the vehicle by the owner/driver, regardless of the vehicle's age. There was a minority view that older vehicles could be less roadworthy due to poorer repairs, and the suggestion that an MOT failure must have been driving around in that condition for some time before it's MOT (although the same could be said for any vehicle).

7.1.2. Do you think that the age of a vehicle relates to its safety?



Yes 30.7%-No **65.0%**-Don't know 4.3%-Number of additional free-form comments received: 71

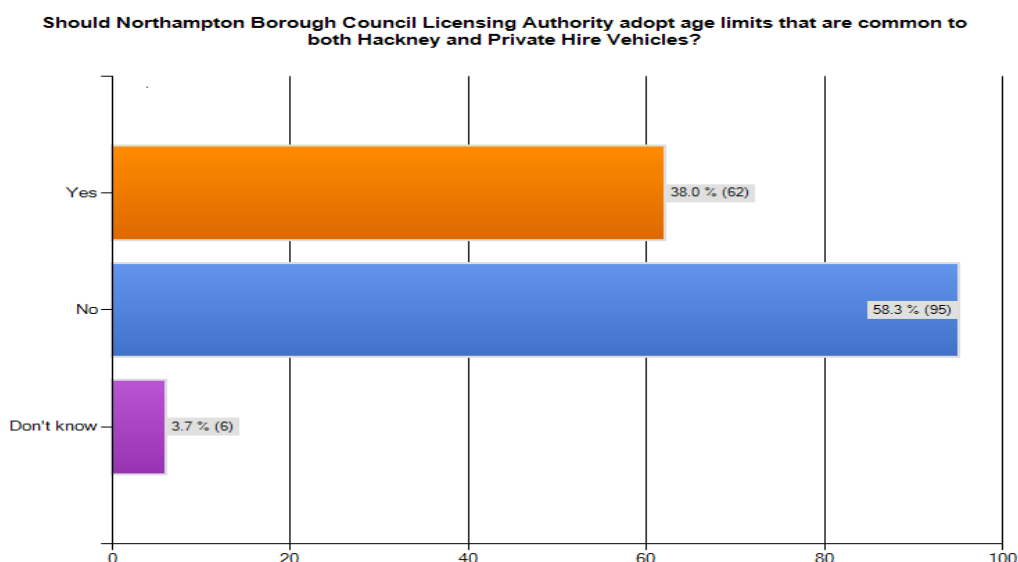
Key themes in relation to the relationship between a vehicle's age and its safety:

- Modern cars have more safety features e.g. air bags, crumple zones, side impact bars.
- Regular maintenance, servicing and condition is the key

- The MOT checks address safety issues
- A new vehicle that is driven every day but not maintained can become more unsafe through low tyre pressures and treads, worn brake pads etc than an older well maintained vehicle
- Even older vehicles have good safety vehicles. Most have air bags, side impact bars and crumple zones and these are becoming more prevalent as time goes on
- Parts will wear out irrespective of condition. Sometimes without notice.
- The way the vehicle is driven is more important
- There could be a correlation but this is mitigated by maintenance regimes otherwise there would be a legal limit for all vehicles

Many of the responses to this question were similar to those of question 2 i.e. that maintenance, regular servicing, how the vehicle is kept on a day to day basis and the MOT tests is more important in keeping a vehicle safe rather than age alone. Again examples were given of how a new neglected vehicle could be more unsafe than an older well kept vehicle. There were respondents who did point out the improved safety features on new vehicles and gave examples of mechanical failures on older vehicles and those who felt it is how the car is driven that is the most important factor. The majority of responses reflected the view that you cannot link the age of its vehicle to safety. There are more important factors like regular maintenance and how the vehicle is driven.

7.1.3. Should Northampton Borough Council Licensing Authority adopt age limits that are common to both Hackney and Private Hire Vehicles?



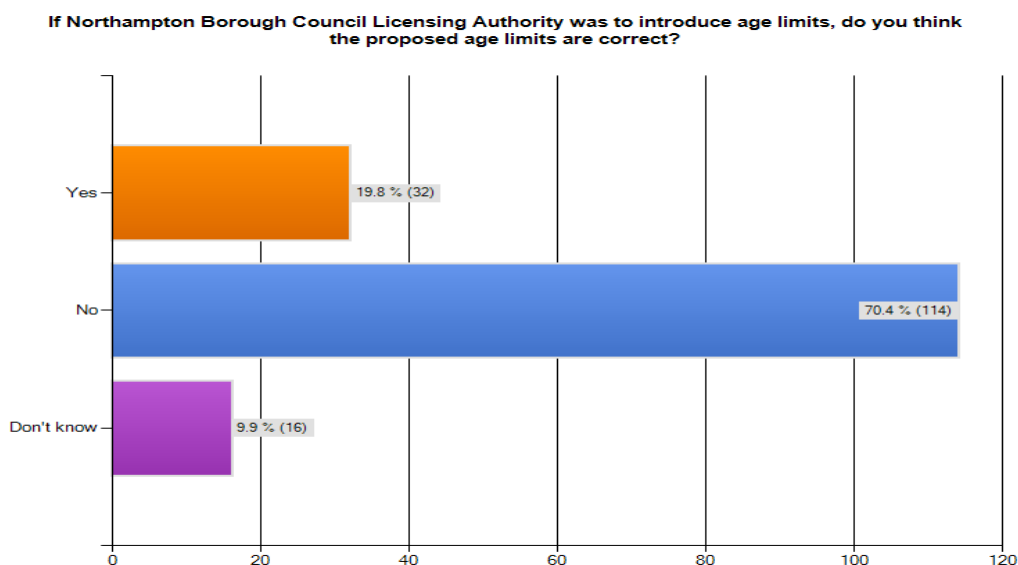
Yes 38.0%-No 58.3%-Don't know 3.7%-Number of additional free-form comments received: 69

Key themes from respondents were:

- There shouldn't be any age limits, just appropriate checks
- It's the same work so the limits should be the same
- Hackneys and Private Hire vehicles should be treated equally
- Hackneys are purpose built, are a huge investment so shouldn't be the same.
- Many Hackneys are just converted cars which are unproven so why treat them differently?
- Hackneys should have a longer age limit than private hire
- Black cabs are a symbol of tradition so should be treated differently as long as they pass the MOT
- Vehicles should be judged on their own merits and not by age
- Black cabs are built on a chassis so all parts can be replaced so they can last longer so should have a longer age limit
- If we have an age limit it will punish drivers who cant afford a new vehicle but look after their older vehicle and present themselves well to the customers
- Hackneys should have a longer limit than Private Hire vehicles
- Some of the old Private Hire vehicles do not portray a good image whereas the old Black cabs look traditional so shorter limit for Private Hire
- If a Hackney or Private Hire vehicle is poor then its poor, no matter what its age.

The majority of respondents felt that age limits should not be common to both Hackney and Private Hire vehicles because Hackney Carriages are purpose built vehicles and therefore can do higher mileages. Also, because Hackneys London cabs are built on a chassis, all parts can be replaced. There were contrary views which felt that many of the newer Hackneys are simply converted normal vehicles and are therefore not really different to saloon cars and therefore should be treated equally. Again a key response was that each vehicle should be judged on its own merits so the MOT test should determine a vehicle's suitability and an assumption in generalising one type of vehicle over another would not necessarily be accurate or fair.

7.1.4. If Northampton Borough Council Licensing Authority was to introduce age limits, do you think the proposed age limits are correct?



Yes 19.8%-**No 70.4%**-Don't know 9.9%-Number of additional free-form comments received: 61

Key themes were:

- Not for Black cabs
- No age limit due to the financial climate as can't afford a new vehicle or change it every 5 years
- Age is irrelevant
- Hackneys should have a longer limit than Private Hire vehicles
- This proposal is stricter than the national average
- This will put many out of work
- If a vehicle passes the MOT's there is no reason to change
- No evidence to show why the proposal is being consulted on
- Current 3 year lower limit for Hackneys only is unfair

While the majority of respondents did not feel the proposed limits were correct, some suggestions were made as to what a limit should be. Examples include:

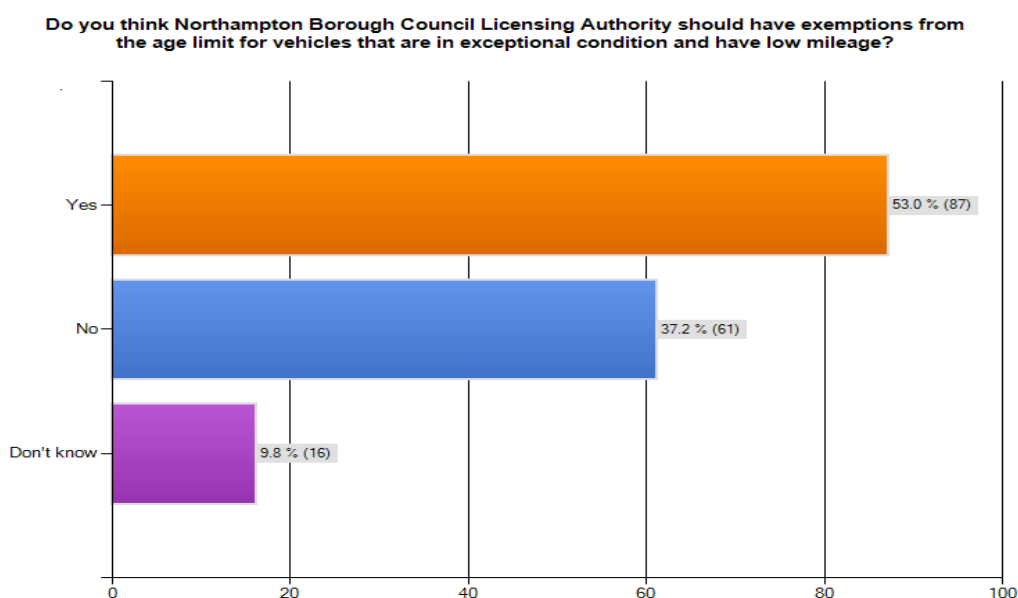
- A lower limit of 5 years with a 10 years upper limit for Private Hire and 12 years for Hackneys
- No age on Hackneys and 7 years on private Hire
- 8 years only whether 1st plate or last
- 10 years for both
- 8 years private hire, 12 years Hackney
- No age limits
- Introduce an age limit for Private Hire to prevent cheap auction vehicles being used

There was no consensus or clear common alternative proposal from the respondents, although a limit from 5 years through 10/12 years was a more

common suggestion, but this was only from a very small minority of respondents.

This question started to provide responses in relation to the financial impact the proposal would have if introduced. For example, if a person bought a 3 year old vehicle to comply with the lower limit it could take 5 years to pay off the finance agreement at which time they would have to buy another vehicle in order to comply with the upper age limit. Other respondents simply said they could not afford to work if the current proposal was introduced.

7.1.5. Do you think Northampton Borough Council Licensing Authority should have exemptions from the age limit for vehicles that are in exceptional condition and have low mileage?



Yes 53.0%-No 37.2%-Don't know 9.8%-Number of additional free-form comments received: 56

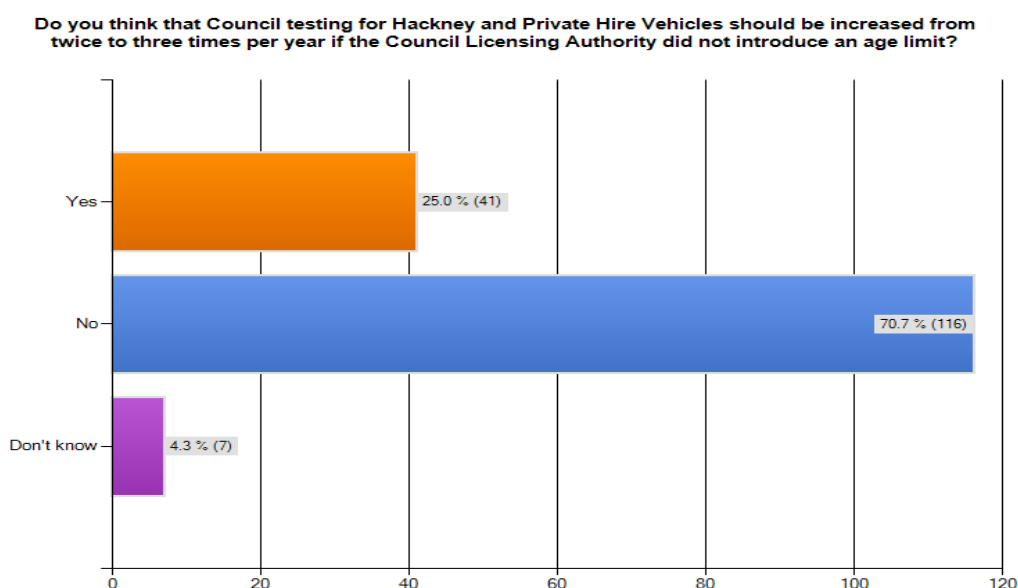
Key themes included:

- Only for specialist vehicles e.g. limousines, chauffeur driven vehicles
- One rule for all
- How can a taxi have low mileage?
- If a vehicle is in exceptional condition
- All down to how a vehicle is looked after, age is irrelevant
- If a vehicle passes the MOT then it should be able to trade

It would seem that most respondents are in favour of exemptions from an age limit policy, with some suggesting that it should be for limousines and other

specialist vehicles only. However, many felt that vehicles that trade day to day should also be exempt if they could demonstrate their vehicle was in excellent condition, but were concerned about what constitutes low mileage as these vehicles are prone to very high mileages. There was a significant minority which clearly felt that any exemption should not be introduced as it would just complicate matters and could create loopholes. Others simply felt that if a vehicle passes the relevant tests it should be able to trade irrespective of age.

7.1.6. Do you think that Council testing for Hackney and Private Hire Vehicles should be increased from twice to three times per year if the Council Licensing Authority did not introduce an age limit?



Yes 25.0%-**No 70.7%**-Don't know 4.3%-Number of additional free-form comments received: 73

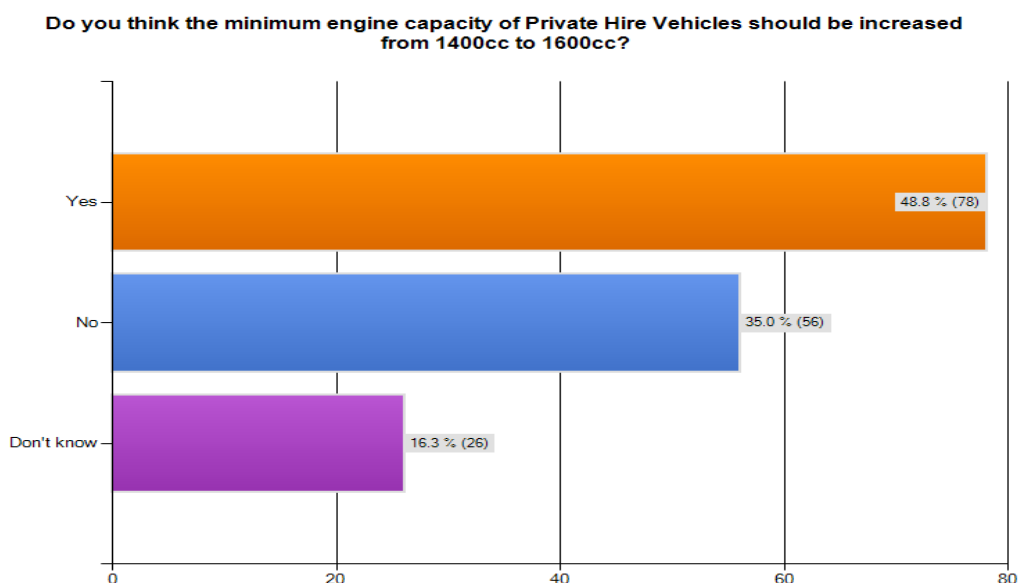
Key themes included:

- Twice yearly testing is enough
- Other towns and cities only have one test
- More use than an age limit
- More frequent spot checks by licensing officers
- Financial implications for the drivers and owners
- For older vehicles only if no age limit
- If there is evidence to support it
- Once a year for Hackneys and vehicles up to 3 years old

From the comments made there was a fairly equal spread across different points of view. Some thought that twice a year being ample with some adding that licensing officers should do more spot checks. The question again raised concerns about the financial burden being placed on drivers and owners. Comparisons were made with other towns and cities where testing is only

once per year and some respondents stating that some vehicles particularly those less than three years should only be tested once. Other respondents felt that three years should be introduced for older vehicles, and across the board if no age limit is introduced.

7.1.7. Do you think the minimum engine capacity of Private Hire Vehicles should be increased from 1400cc to 1600cc?



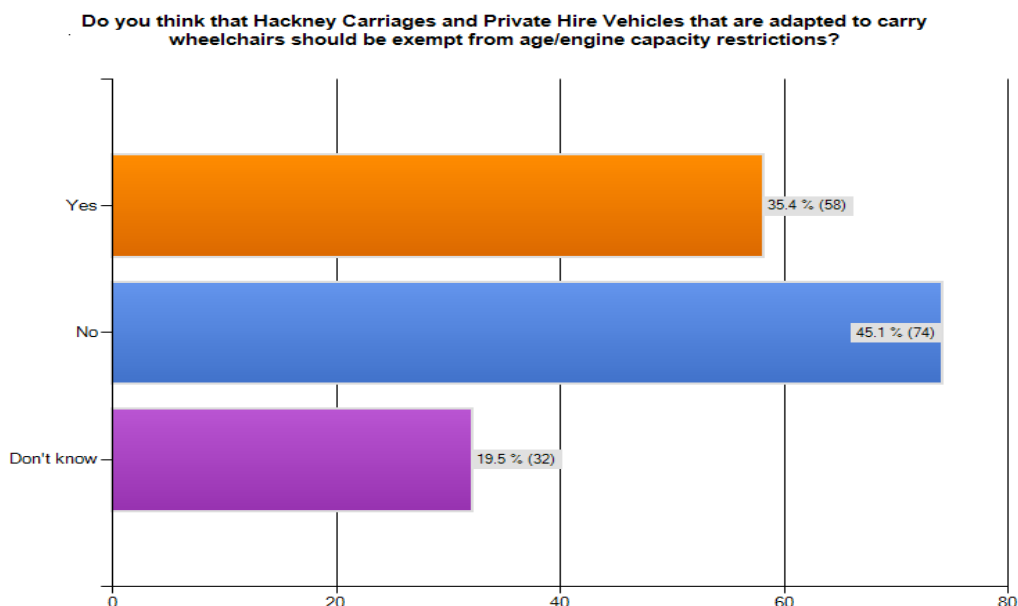
Yes 48.8%-No 34.9%-Don't know 16.3%-Number of additional free-form comments received: 61

Key themes identified:

- Modern engines are more powerful than they were so 1400cc is more powerful and cleaner than an older equivalent 1600cc
- Often the 1400cc vehicles are too small to carry 5 passengers
- No purpose to changing the current system, not enough difference in 200cc.

While the majority ticked yes to this answer, the comments received were more against the proposal. Many respondents didn't see the logic in this move quoting brake horse power as being more important than cc and concerns about emissions in larger engined vehicles. It was felt that a 200cc change wasn't sufficient enough to make any real difference. Those who were in favour of the change generally thought that smaller engined vehicles often had smaller body sizes and might struggle when carrying a fully loaded vehicle with a 1400cc engine. Others felt that a larger vehicle provided more comfort for passengers.

7.1.8. Do you think that Hackney Carriages and Private Hire Vehicles that are adapted to carry wheelchairs should be exempt from age/engine capacity restrictions?



Yes 35.4%-**No 45.1%**-Don't know 19.5%-Number of additional free-form comments received: 53

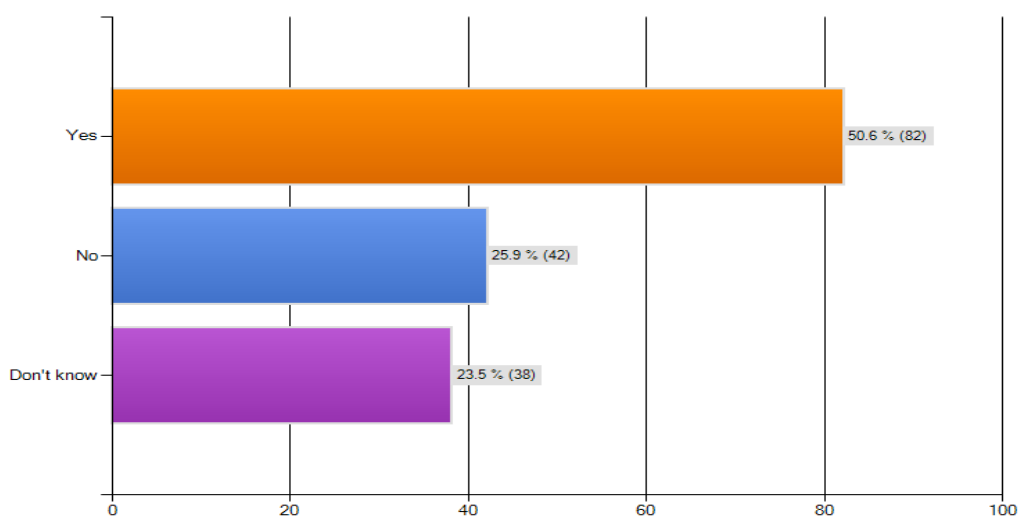
Key themes included

- An exemption gives the impression that disabled people can use older vehicles whereas everyone else uses new ones
- The cost of adapting a vehicle is expensive
- All Hackneys are made to carry wheelchair
- Age is irrelevant. It should be about condition of vehicle
- Rules should be the same for all

There was some concern amongst respondents that without exemptions to an age limit, access for disabled persons would be reduced as all Hackneys are fitted with features to accommodate disabled persons. This was echoed by Private Hire owners who also incur significant expense when converting vehicles with lifts and other equipment. Some respondents felt that by having an age limit exemption it is implying that disabled people would be making do with older vehicles. The majority felt it should be the same rules for all with no exemptions.

7.1.9. If the minimum engine capacity of Private Hire Vehicles is increased from 1400cc to 1600cc, should Northampton Borough Council Licensing Authority have exemptions (e.g. for hybrids, which are generally 1500cc)?

If the minimum engine capacity of Private Hire Vehicles is increased from 1400cc to 1600cc, should Northampton Borough Council Licensing Authority have exemptions (e.g. for hybrids, which are generally 1500cc)?



Yes 50.6%-No 25.9%-Don't know 23.5%-Number of additional free-form comments received: 44

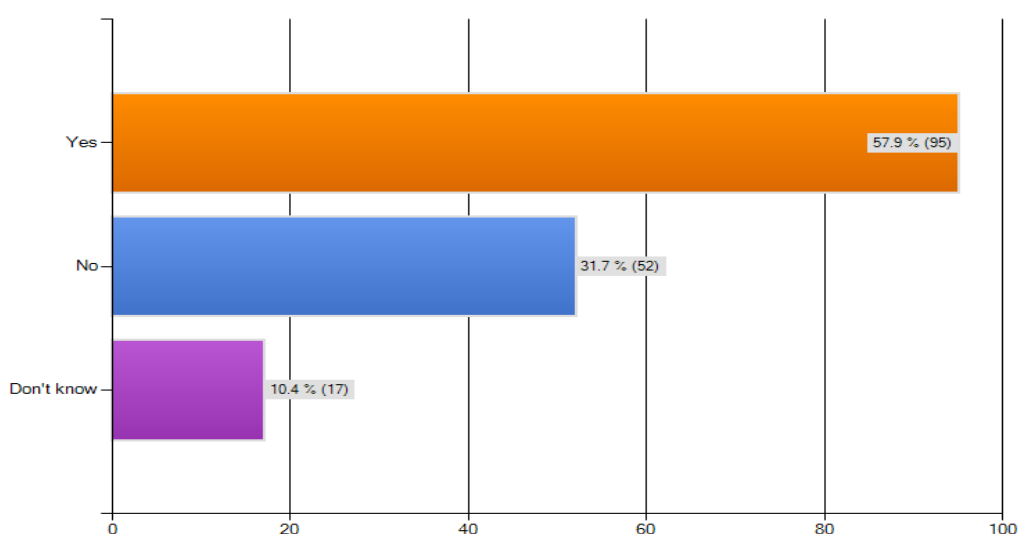
Key themes included:

- Green initiatives should be encouraged
- As long as they pass the other tests
- There shouldn't be any increase in engine capacity
- There should be no exemptions from any changes in policy

It was clear that from the responses, initiatives that improve the environment should be supported. Respondents also raised the issue about not increasing the engine capacity from 1400cc to 1600cc for similar reasons as long as testing arrangements are complied with. Other respondents felt that there should be no exemptions and that any exemption creates loopholes and would complicate the matter.

7.1.10. At present all vehicles, irrespective of age, have to have an MOT certificate and a council test to receive a plate and are then re-tested by the Council again after 6 months. Should all brand new vehicles be exempt from a council re-test until 12 months from first DVLA registration?

At present all vehicles, irrespective of age, have to have an MOT certificate and a council test to receive a plate and are then re-tested by the Council again after 6 months. Should all brand new vehicles be exempt from a council re-test until 12 months from first DVLA registration?



Yes 57.9%-No 31.7%-Don't know 10.4%-Number of additional free-form comments received: 49

Key themes included:

- Incentive to buy new cars
- New vehicles should be roadworthy for 12 months
- Most cars don't need an MOT for 3 years
- Council test only
- Under manufacturers warranty
- A new vehicle can undertake a very high mileage in a short period of time so should be tested and deteriorate rapidly
- Faults can occur at any time
- The first test yes, but not the second

Whilst the majority of those who ticked yes to this question, the majority of those who commented generally seemed to feel that the 6 monthly test should not be removed as high mileages can be achieved in a relatively short period and things like bulbs, brakes, lights and tyres can all become faulty within a year. However, the relevance of having an MOT on a brand new vehicle was questioned, and others felt that there should not be a requirement to have an MOT certificate until three years from first registration.

7.1.11. Can you suggest any other ways that Northampton Borough Council Licensing Authority could increase public safety reliability and comfort for passengers?

108 suggestions were made by respondents. They have been grouped as follows:

- Increased spot checks (cleanliness, flagging, condition, multiagency, alcohol, smoking)
- Introduce all vehicles as Hackneys
- Improve standards of driving and presentation
- Advanced driving test for drivers
- Work closer with the trade
- Mandatory breaks for drivers
- Ensure English is spoken effectively
- Review of MOT testing centres
- Booster seats available in vehicles
- Limit the number of vehicles
- Introduce a minimum leg room
- Improve the safety of drivers
- Colour/banding of vehicles for clear recognition
- More transparent complaints procedure about problems with taxis

7.1.12 Can you suggest any other ways in which Northampton Borough Council Licensing Authority could help reduce emissions/pollutants from Hackney Carriage and Private Hire vehicles?

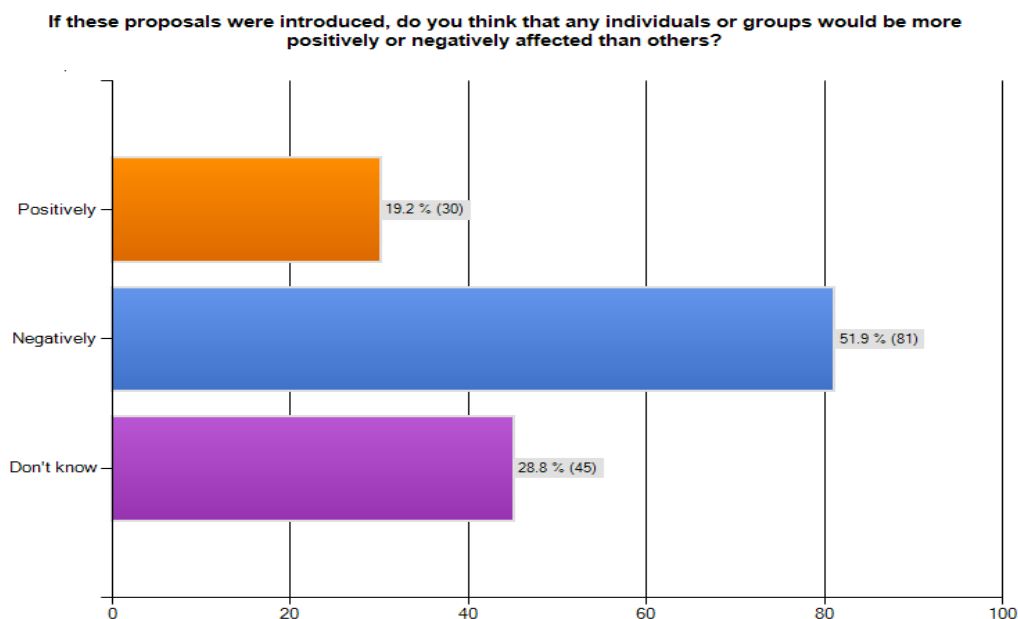
88 suggestions were made in relation to helping reduce emissions. Of those that fall within the remit of Northampton Borough Council they have been grouped as follows:

- Introduce a specific emissions test
- Catalytic converters fitted to all taxis
- Limit the number of Hackney and Private Hire vehicles and introduce age limits
- Encourage hybrids and other sources of power e.g. electric
- More spot checks
- Leave 1400cc engine capacity requirement as it is
- Introduce incentives for hybrids etc, e.g. reduced licensing charges
- Work with owners/operators to promote higher standards and work with other departments and agencies to review road routes
- Adapt older vehicles to comply with more recent emissions standards
- NBC should improve its green policies generally and not just focus on the trade

Other issues raised not within the remit of NBC were:

- Remove traffic lights at St Peters Roundabout, allow taxis to Gold St from railway station, and allow them to turn right from railway station, rather than more congestion towards St Peters Roundabout
- Open bus lanes to the trade
- Sensor activated traffic lights at night time
- Reduce idling and encourage stop/start technology

7.1.13 If these proposals were introduced, do you think that any individuals or groups would be more positively or negatively affected than others?



Yes 19.2%-**No 51.9%**-Don't know 28.8%-Number of additional comments received: 84

The overwhelming majority of respondents who made comments felt that the introduction of the proposal would have a negative impact. Groups within the trade were identified as the primary group the proposed changes would affect. Key themes included:

- Increased cost of renting vehicles
- Many unable to afford new/3 year old vehicles
- Unemployment and owners/operators going out of business
- Increase in fares to the public
- Financial pressure on drivers/owners/operators and their families
- Should be encouraging local enterprise not destroying it
- Proposal targets the most vulnerable
- Age is immaterial
- Waste of well maintained vehicles
- Many drivers are not creditworthy so will be forced out of the trade
- Could result in an increase in flagging and other unlawful activities to try and make ends meet
- Unnecessary restrictions, perfectly usable testing regime already exists
- Inflated prices of Hackneys due to three year rule
- More financial impact on Hackneys due to higher cost of vehicle

There were also concerns that the introduction of this proposal would negatively impact to a larger extent on drivers and owners from certain minority groups who run serviceable but older vehicles.

A small number of comments thought the introduction of the proposal would lead to a positive impact for the people of Northampton in general as they would be utilising newer cars. Comments also suggested that the introduction would increase the standard of vehicles and do away with owners who use unroadworthy older vehicles.

The main issue from this question though was the severe financial implications that would affect all aspects of the trade particularly in light of the current financial situation.

7.1.13 Do you have any other comments in relation to this consultation?

83 comments were made and have been grouped as follows (where not mentioned before)

- Consultation should be based on evidence
- Not a good use of money
- Cancel the consultation
- More testing centres
- Standardise colours for Hackney and Private Hire vehicles and uniforms for drivers
- Buses and other public vehicles have no age limits
- Issues around the railway station
- Increase the transition period to allow owners time to purchase newer vehicles
- Limit the number of drivers/vehicles
- Manufacturing new vehicles has a massive negative ecological effect
- Use common sense
- Help the drivers don't penalise them (duty of care)
- Reduce to one testing station so a standard is maintained
- Consultation questions are skewed toward an outcome that isn't wanted
- Opinions do not matter its evidence that counts.

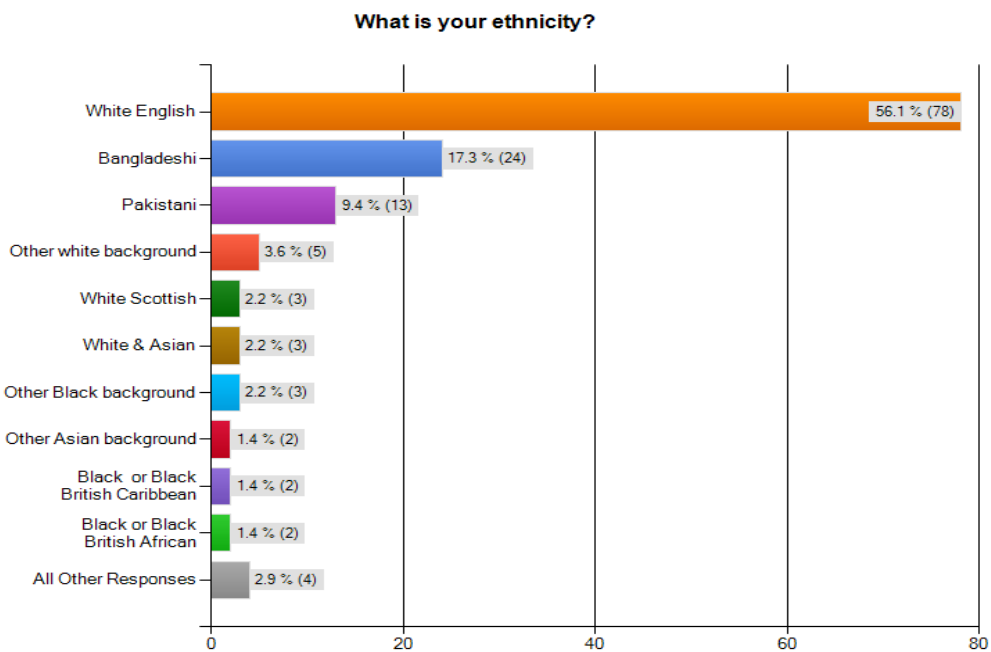
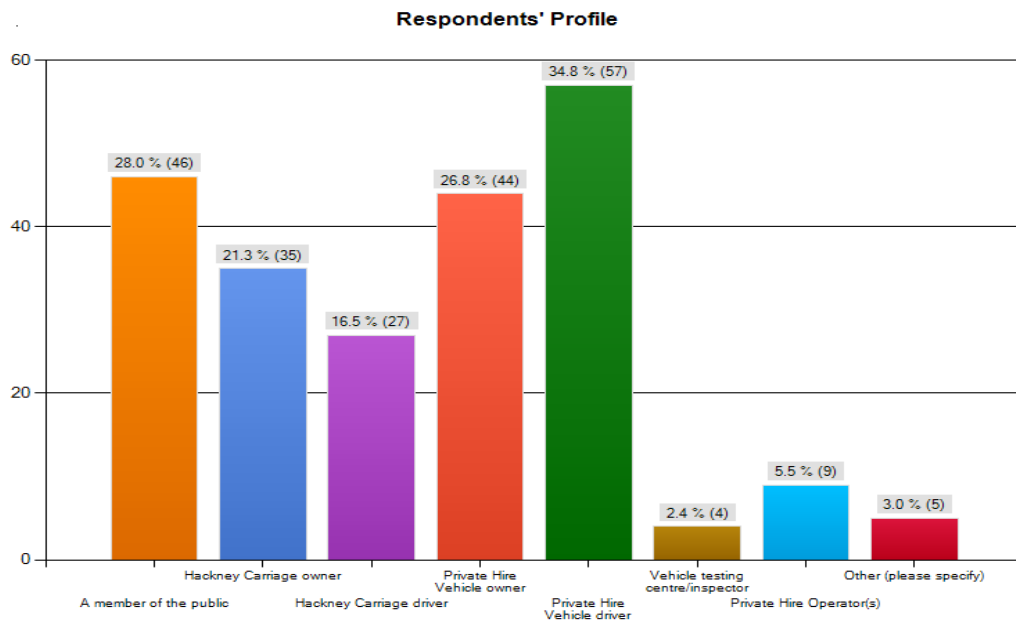
Where questions have requested suggestions be made to address certain issues, Northampton Borough Council Licensing Authority will consider, where possible and relevant, how they may be implemented.

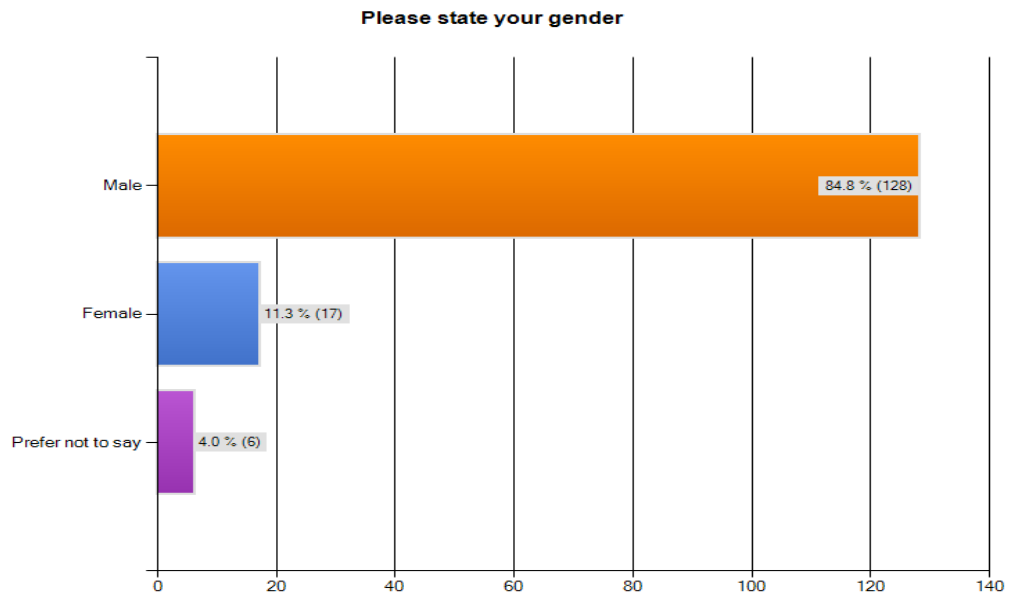
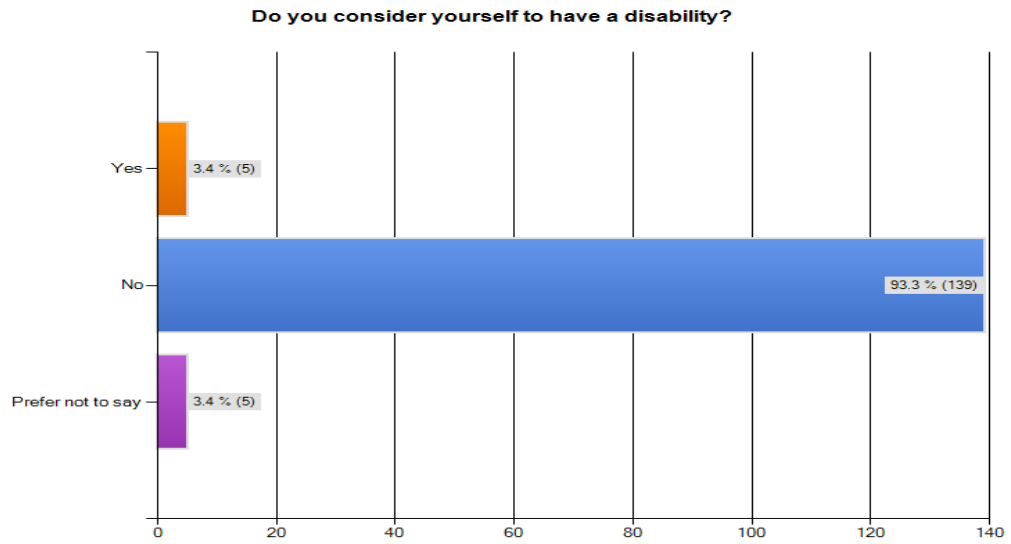
8 Additional findings

- 8.1 Respondents provided in excess of 981 comments, including details about specific proposals, concerns about potential impacts that were considered to affect various sectors of the community and also about alternative proposals for efficiencies. A full list of the comments provided are reproduced in Appendix 3a

- 8.2 A report was received from a Hackney carriage owner entitled 'A Comprehensive Review of the Proposal to Introduce Age Limits for Black Cabs & Private Hire Vehicles in Northampton'. The sections of the report that are relevant to this consultation have been incorporated in the comment responses to the questions listed above. A copy of this report was submitted to the Licensing committee and can be found in Appendix 3b

Demographics





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Northampton Borough Council

Hackney Carriage and Private Hire Vehicle Age Limit – MOT Inspection Findings Report

Report authors:

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Executive Summary

This report contains the findings following analysis of MOT inspectors reports on all Hackney and Private Hire vehicles tested at the two Vehicle testing centres contracted by Northampton Borough Council between November 25th 2011 until 29th February 2012.

Key Findings

- There is no evidence to suggest from those vehicles tested that if an upper age limit is introduced it should not be common to both Hackney and Private Hire vehicles
- If the proposed upper limit of 8 years was introduced the analysis shows that of the 389 vehicles tested 138 vehicles would be unable to trade. This would reduce the failure rate on mechanical and structural defects by 15% from a benchmark utilising 2010 failure rates of vehicles tested.
- If an upper age limit of 10 years was introduced the analysis shows that 54 of the 389 vehicles tested would be unable to trade and this would reduce the failure rate on mechanical and structural defects by 22% from a benchmark utilising 2010 failure rates of vehicles tested
- If an upper age limit of 10 years was introduced the analysis shows that 20 of the 389 vehicles would be unable to trade and this would reduce the failure rate on mechanical and structural defects by 24% from a benchmark utilising 2010 failure rates of vehicles tested
- There is no evidence to suggest that the current lower age limit of 3 years subject to Hackney carriages only has any measurable relevance.
- There is no evidence to suggest that a lower age limit should not be common to both Hackney and Private Hire vehicles
- If a lower age limit was introduced there is some evidence to suggest that 5 years would be more realistic as of those vehicles tested, those of that age had the lowest failure rate and the highest number tested.
- While this research focussed on the mechanical/structural defects on vehicles tested, it should be noted that routine failures were consistent across the age range and vehicle types. In many instances the amount of 'routine' defects' could contribute to the roadworthiness and safety of a vehicle. This indicates that everyday maintenance and care of the vehicle in-between MOT tests is a key factor in roadworthiness and safety.
- By utilising the current emissions tests associated with the year of manufacture of the vehicle, emissions is not shown to be a serious cause of concern in Hackney and Private Hire vehicles.

2. Introduction

On 27 September 2011 the Northampton Borough Council Licensing Committee agreed to consult on the feasibility of introducing age limits for Hackney Carriages and Private Hire Vehicles, to increase the engine capacity of Private Hire Vehicles from 1400cc to 1600cc and associated exemptions.

The committee requested that all interested parties, be they in the trade, associated with the trade or members of the public, have the opportunity to have a say.

A part of the reasoning when implementing Age Limits is that the age of a vehicle is related to its roadworthiness and safety. Questions in relation to roadworthiness and safety have been asked during the consultation and opinions have been received from respondents. Those responses are being analysed separately and will inform the main report.

However, it is essential that as well as opinions, perceptions and experiences, other evidence specifically in relation to the condition of vehicles should be included to inform the overall findings.

We have obtained vehicle testing reports from the two contracted MOT inspectors for Hackney and Private Hire vehicles.

The results of the analysis of these tests are contained within this report.

3. Methodology

To assist the Licensing committee in making any decision about introducing an age limit in relation to Hackney and Private Hire vehicles it was decided to analyse inspection reports from the two NBC contracted inspectors. The purpose being to identify whether there was any clear correlation between the age of a vehicle and any mechanical or structural failure

A total of 389 reports of tests undertaken between 25th November 2011 and 29th February 2012 were received. They were analysed and the following details were recorded:

- Hackney Carriage or Private Hire vehicle
- Its year of registration
- Whether it passed or failed
- Whether the failure was due to a routine defect or a defect that related to mechanical or structural wear

It was important to differentiate between defects that are common to any age vehicle, and those that tend to happen to an older vehicle. An assessment was undertaken and defects that were classed as routine included but were not limited to:

- Brake pads and discs
- Lights, bulbs, headlight aim
- Tyres
- Cleanliness
- Trim issues
- Wipers, washers
- Non corroded body work issues
- Licence conditions issues such as spare bulbs, fire extinguisher, first aid kit and plates, signage
- Emissions

Mechanical and structural defects included but were not limited to:

- Anti roll bar issues

- Oil and fuel leaks
- Cv issues
- Trailing arms
- Driveshafts
- Engine mounts
- Steering rack issues including leaks to power steering
- Ball joints
- Wheel bearings
- Corrosion to bodywork including sills, wings, inner wings, floor, wheel arches
- Suspension
- Leaking callipers
- Corroded brake pipes and hoses

It is also recognised that due to the high mileage that these vehicles cover, mechanical and structural wear is likely to occur sooner than on an average vehicle.

The graphs below predominantly use a measurement in number of vehicles rather than percentages as some of the numbers are so low that to use percentages could give a skewed perspective.

As defects that are classed as routine can occur on any age vehicle the intention has been to exclude them from the graphs below and only consider mechanical/structural defects. However, reference is made to them within the Additional Observations at the end of this report.

It should also be stressed that this is only analysis of the 389 test reports and cannot be utilised as an accurate assessment of the state or condition of all Hackney or Private Hire vehicles in Northampton. It could be that if we did this exercise again in six months time a different picture could be shown. This analysis should only be viewed as an indicator of the condition of a significant proportion of vehicles that operate in Northampton during the time period when the vehicles went in to be tested.

It should also be remembered that all those vehicles that failed would have to have had all faults rectified in order to be licensed as a Hackney or Private Hire vehicle.

Vehicle reports were also used for vehicles under 12 months old. While these vehicles do not require an MOT, they still undergo a six monthly test.

4. Equalities

An Equalities impact Assessment was undertaken prior to the consultation process being undertaken

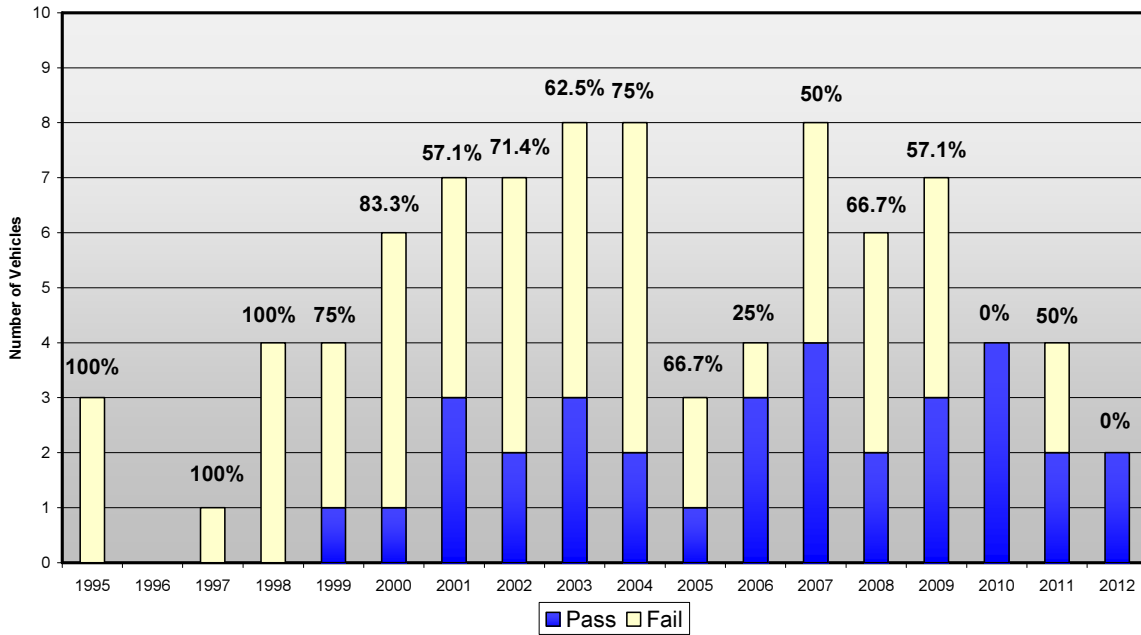
5. How will these findings be used?

Results and recommendations will be presented to the Licensing Committee on 8 May 2012.

6. Graphs

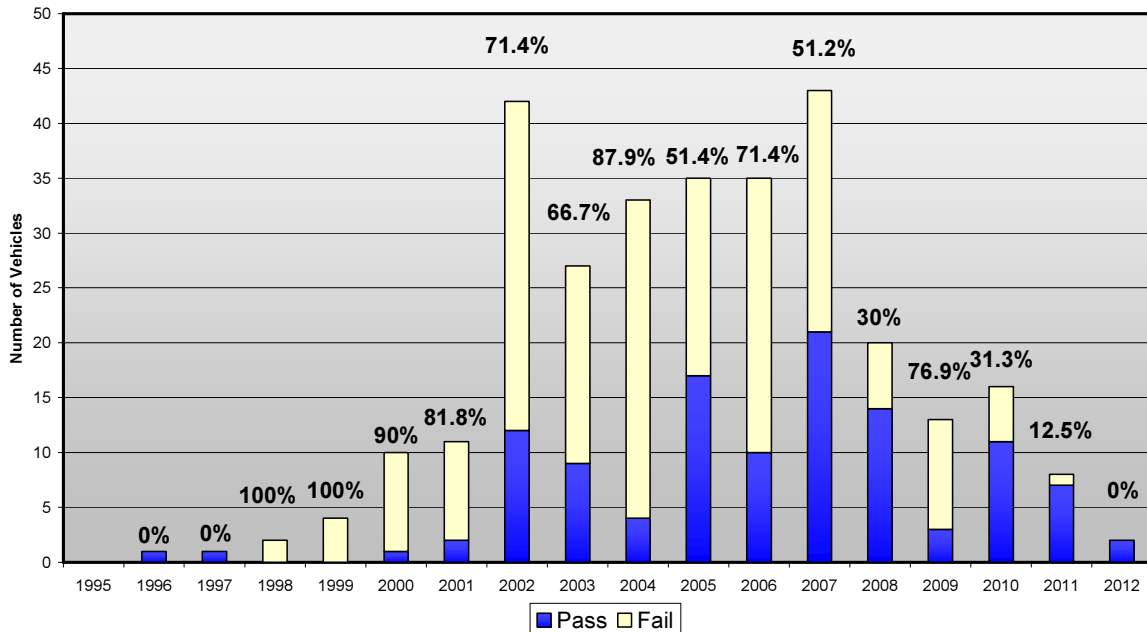
In the following graphs, the blue and cream mixed columns, or a complete blue column represent the number of vehicles by year of manufacture. The measurement in numbers is down the left of the graphs. The cream element of the column or a cream column represents the failure rate of the vehicles tested by year of manufacture. The number at the top of the column represents the percentage failure rate by year of manufacture.

Hackney Vehicles: M.O.T Failure Rate By Age of Vehicle



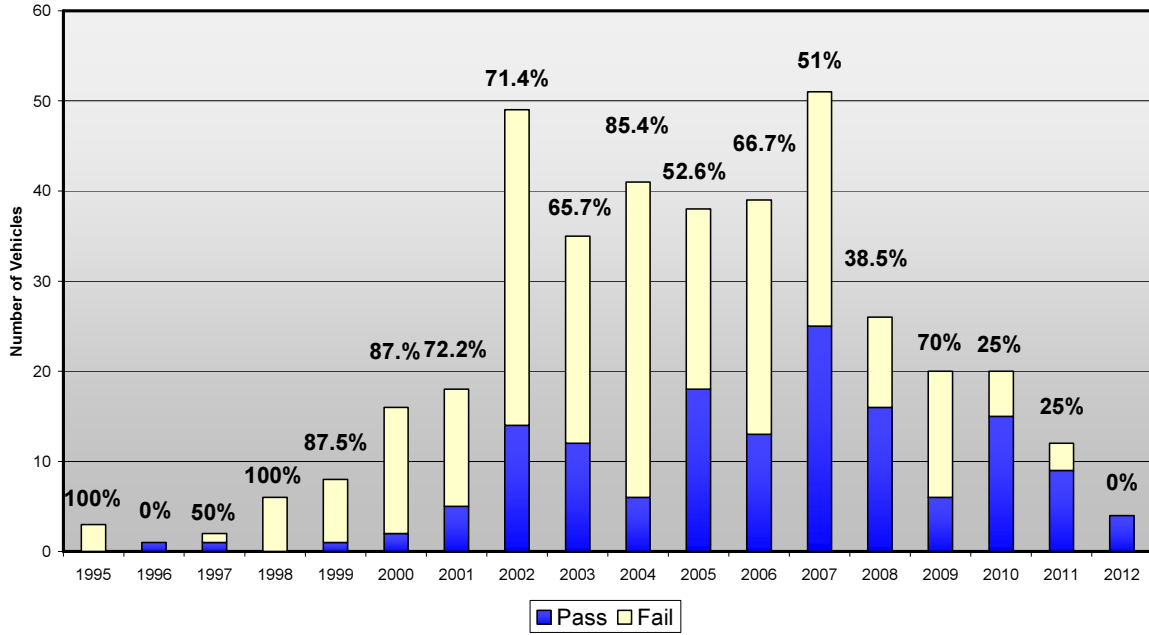
The above graph shows the pass/failure rates of all Hackneys by year of registration. Apart from all eight vehicles failing in the 95,97 and 98 columns and the six vehicles passing in the 2010 and 2012 columns there is no clear trend as the pass/failure rate is fairly constant.

Private Hire Vehicles: M.O.T Failure Rate By Age of Vehicle



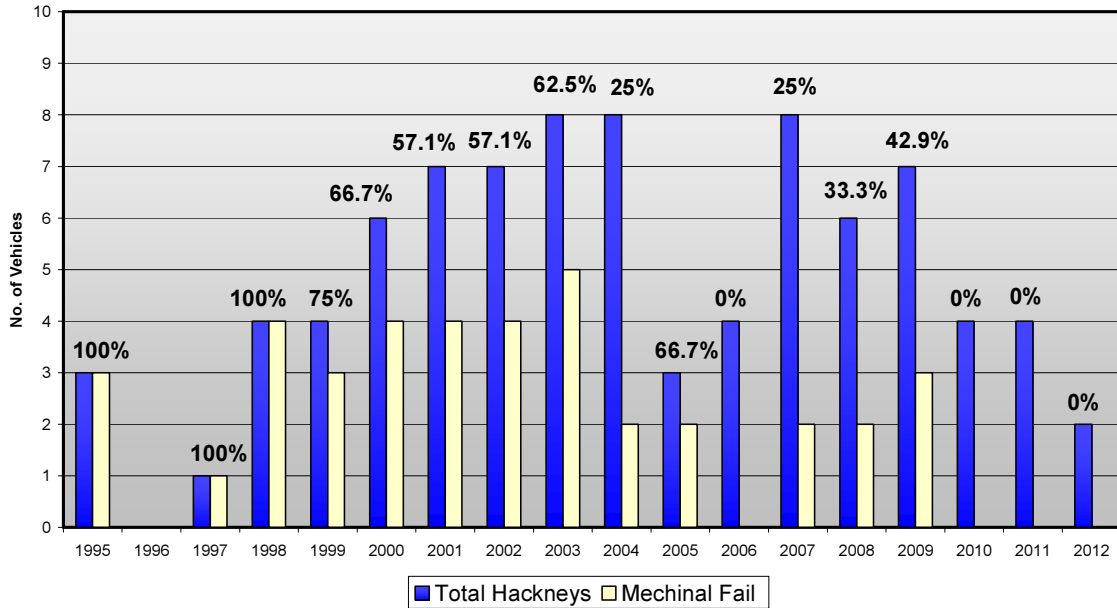
The graph above shows the pass/failure rate of all Private Hire vehicle reports received by year of registration. The oldest private hire vehicles passed in comparison with the older Hackneys, but these are very low numbers. Again, there is no clear trend in pass/failure rates when the number of vehicles tested in each year is considered

All Vehicles: M.O.T Failure Rate By Age of Vehicle



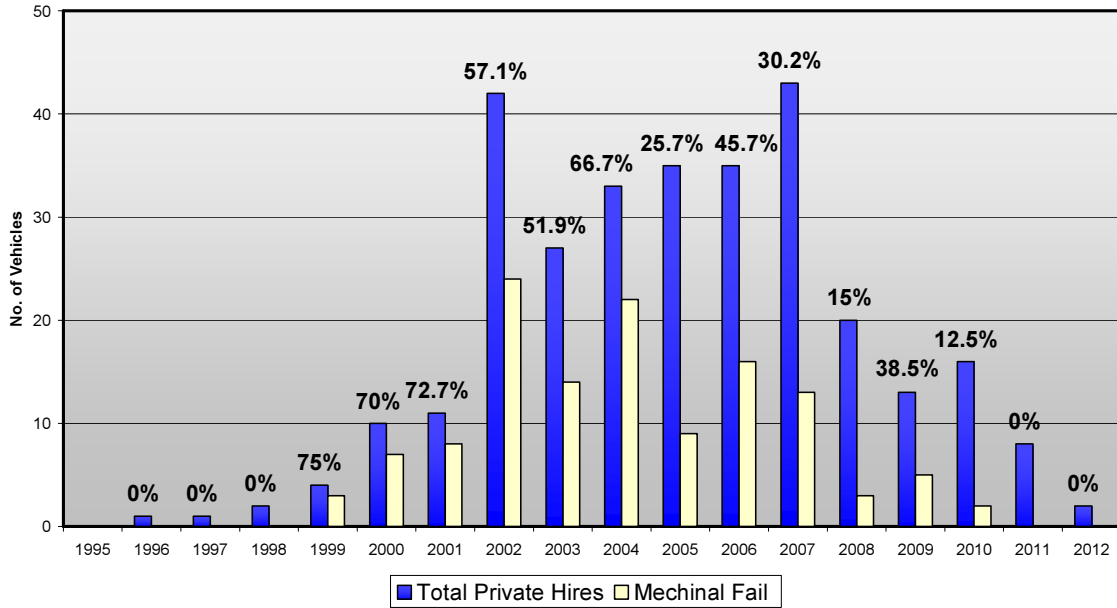
The above graph shows the overall pass/fail rate of all licensed vehicles. Again there is no clear trend bearing in mind the numbers tested from each year.

Hackney Vehicles: % which failed M.O.T on Mechanical/ Structural Failure



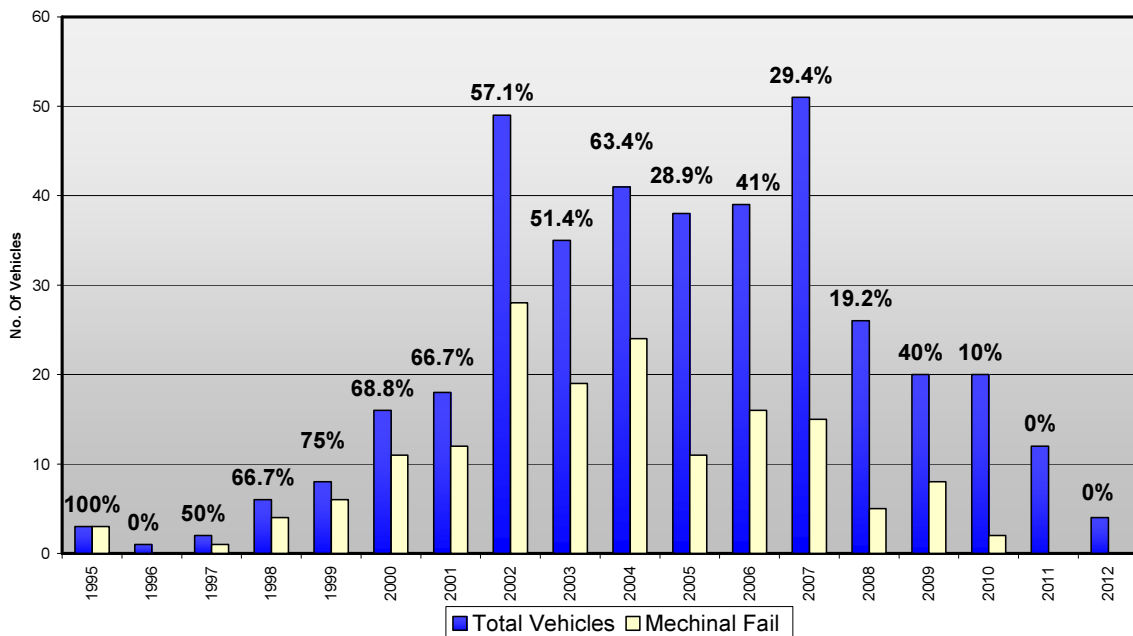
This graph shows the percentage of Hackneys from each year that failed where mechanical and structural defects were present.

Private Hire Vehicles: % which failed M.O.T on Mechanical/ Structural Failure



The above graph shows the percentage of Private Hire vehicles that failed the MOT where mechanical/structural defects were also present. The blue column shows the number of vehicles tested and the brown columns show the number that failed. The percentage number relates to the percentage of failures. The oldest Private Hire vehicles tested did not demonstrate mechanical/structural failures, but it should be noted that numbers tested are very low.

All Vehicles: % which failed M.O.T on Mechanical/ Structural Failure

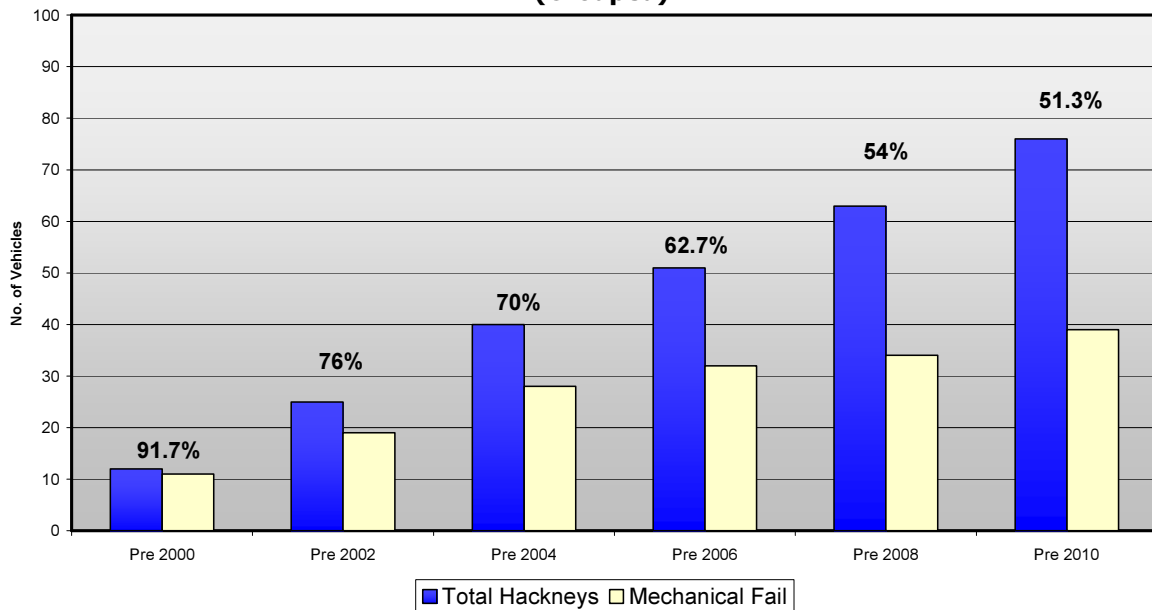


The above graph shows the percentage failure rate where mechanical or structural defects were present, and the number of vehicles tested by year. While initially it may indicate that vehicles from 2002 through to 2008 had less mechanical or structural defects this should be weighed against the considerably higher numbers of vehicles tested from those years.

The following graphs have been presented in a way which places MOT failures where mechanical/structural defects were present into age groups. This has been done to show the rate

of failures pre and post 2004. 2004 being the upper age limit in the original Age Limit proposal document. Please note that the columns are cumulative so incorporate the figures from the associated column. E.g. Pre 2004 column includes the figures in the pre 2002 and pre 2000 columns

Hackney: % which failed M.O.T on Mechanical/ Structural Failure (Grouped)



This graph indicates that of the 12 pre 2000 Hackneys tested, 91% failed partly due to mechanical/structural defects.

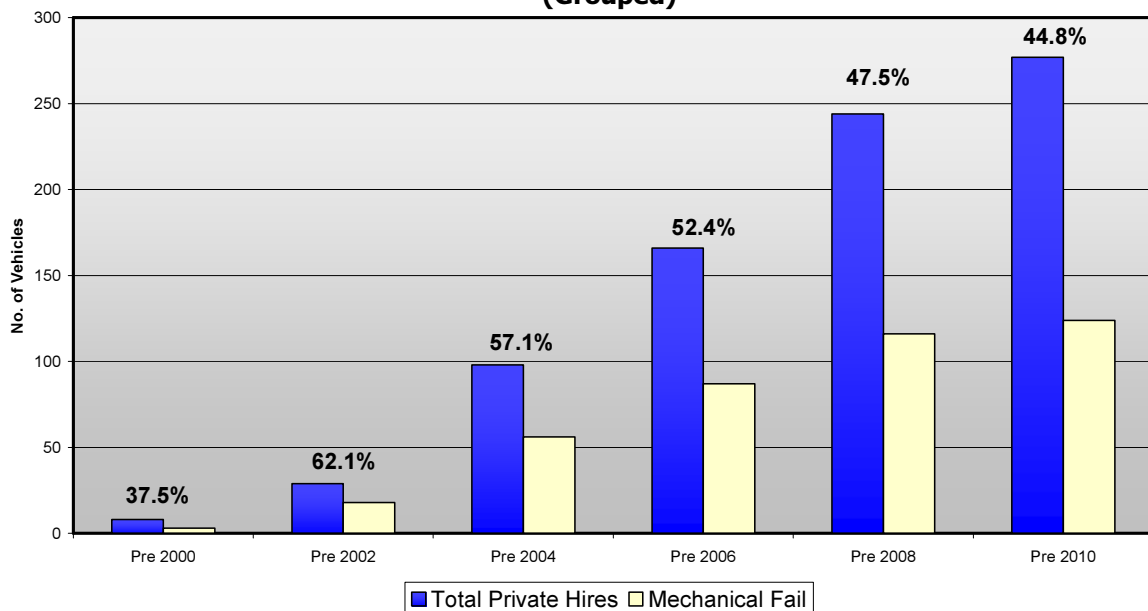
Of the 25 pre 2002 Hackneys tested, 76% failed partly due to mechanical/structural defects

Of the 40 pre 2004 Hackneys tested, 70% failed partly due to mechanical/structural defects

Of the 46 post (and including) 2004 Hackneys tested 24% failed partly due to mechanical/structural defects.

Of the 35 post (and including) 2006 Hackneys tested, 20% failed partly due to mechanical/structural defects

Private Hire: % which failed M.O.T on Mechanical/ Structural Failure (Grouped)



The above graph indicates that of the 9 pre 2000 Private Hire vehicles tested, 38% failed partly due to mechanical/structural defects.

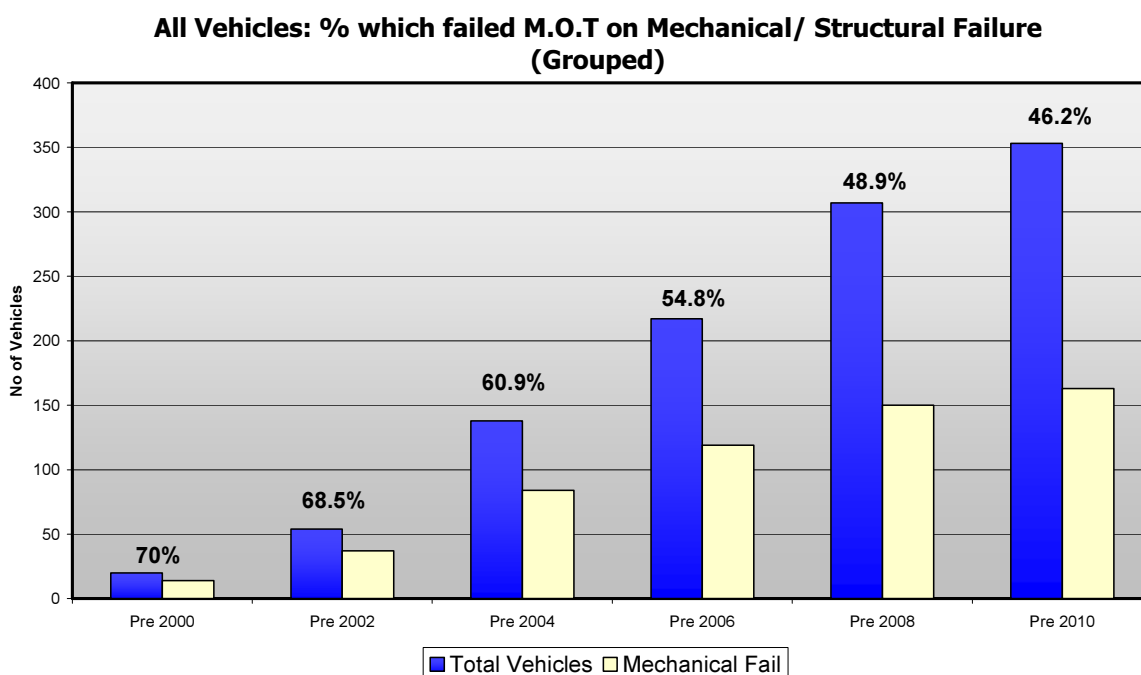
Of the 30 pre 2002 Private Hire vehicles tested, 61% failed partly due to mechanical/structural defects.

Of the 93 pre 2004 Private Hire vehicles tested, 58% failed partly due to mechanical/structural defects

Of the 205 post (and including) 2004 Private Hire vehicles tested, 32% failed partly due to mechanical/structural defects

Of the 137 post (and including) 2006 Private Hire vehicles tested, 29% failed partly due to mechanical/structural defects.

This indicates that the older Private Hire vehicles tested during this time suffered less from mechanical/structural defects than similar aged Hackneys.



The above graph captures the overall percentage failure rate where mechanical and structural defects were present. It also shows the number of vehicles tested by age group. It is clear that a higher percentage of older vehicles failed on these grounds than newer vehicles. However, there are substantially higher numbers of newer vehicles so it could be argued that if there are more vehicles then there is a higher probability that more would pass.

7. Upper Age Limit

8 years

The proposal document attached to the consultation questionnaire suggested as a guideline, an upper age limit of 8 years. The current overall failure rate where mechanical and structural defects were present of all 389 vehicles tested was 42%. If the 8 year cut off was to be introduced at this time, 138 (35.5%) of the vehicles tested would be unable to trade. The 138 vehicles would be made up of 40 Hackneys and 98 Private Hire vehicles. There would be an overall reduction in the failure rate where mechanical and structural defects are present of 10% from 42% to 32%.

10 years

At this time, a 2002 cut off would remove 54 (13.9%) vehicles of the 389 tested and reduce the overall failure rate where structural/mechanical defects were present by a further 6%. The 54 vehicles would be made up of 35 Hackney Carriages and 29 private Hire vehicles.

12 years

Using 12 years as a cut off would result in 20 (5.1%) of the 389 tested vehicles being unable to trade and reduce the failure rate where structural/mechanical defects were present by a further 2.5%. The 20 vehicles would be made up of 12 Hackney Carriages and 8 Private Hire vehicles.

The impact of any of the above on the owners/operators/drivers in order to achieve such a percentage reduction, also bearing in mind those vehicles of similar ages that did not have these defects would need to be taken very seriously.

On analysis of the information received there is no evidence to suggest that Hackney carriages are less susceptible to mechanical/structural defects than Private Hire vehicles. Therefore if an upper age limit was introduced it should be common to both types of vehicle.

8. Lower Age Limit

There is no evidence to suggest that the lower age limit of three years currently only relevant to Hackney carriages has any relevance.

Considering the number of vehicles tested and the failure rate on mechanical/structural grounds, a more realistic lower age limit would be 5 years. The highest number of vehicles tested and the lowest failure rate was 2007. There is also no reason why, if a lower age limit was introduced, it should not be common to both Hackney and Private Hire vehicles

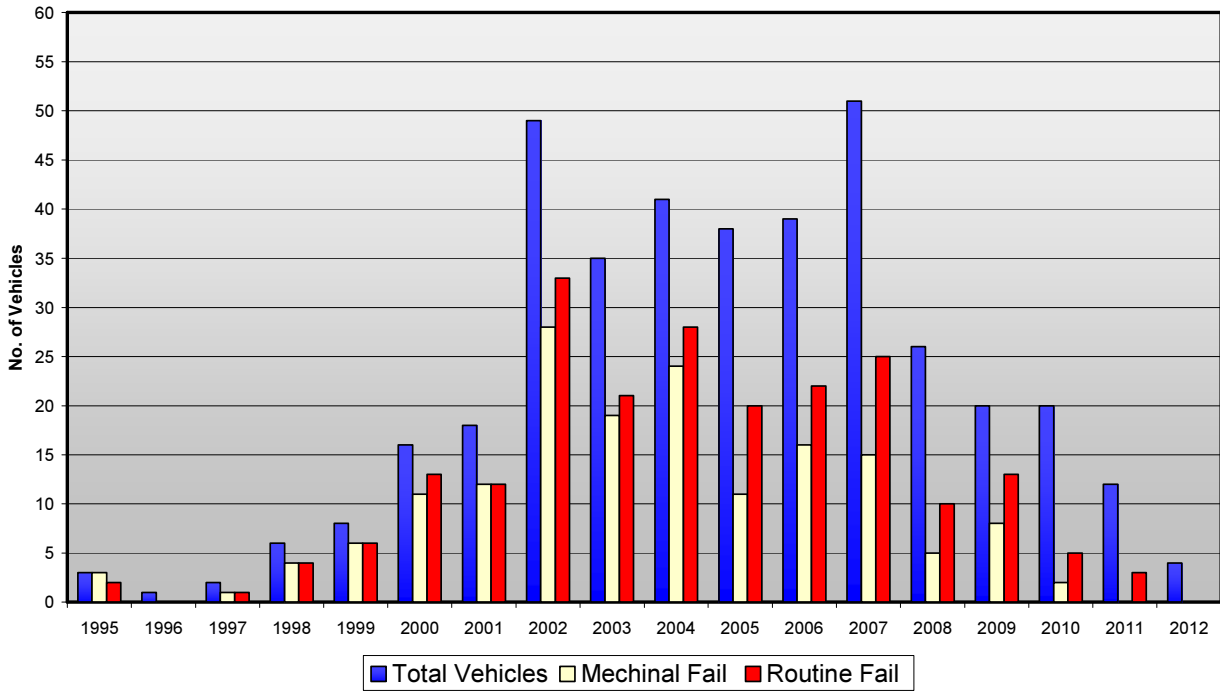
9. Emissions

Of the 389 MOT reports received, only 24 listed emissions as a fault which led to failure. This would indicate that emissions are not an issue of concern in relation to Hackney and Private Hire vehicles. However, the requirement in Northampton in order to pass the emissions test is that the vehicle needs only to pass the test that was in place during the vehicle's year of manufacture. If all vehicles were tested at Euro standards level 4 or level 5, which is the latest emissions test, and has been introduced in some local authority areas, we could see a completely different perspective

10. Additional Observations

While defects classed as 'routine' have been excluded from this analysis due to the fact that they can occur on any age vehicle, it has become apparent whilst undertaking this study that they should not be disregarded completely. The graph below shows that failure on routine defects matched or exceeded mechanical or structural defects on every age of vehicle post 1998. The nature and number of these routine defects that feature on a wide range and age of vehicles could seriously affect the safety or roadworthiness of a vehicle. The main observation was that it is often how the vehicle is looked after and maintained in-between MOTs by the driver/owner that is the most important factor in determining the condition of a vehicle.

All Vehicles: Routine & Mechanical M.O.T Failures



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Full Consultation Results Comments

Question 1

Taxi Policy Consultation

Are you? (Please tick all that apply)		
Answer Options	Response Percent	Response Count
A member of the public	28.0%	46
Hackney Carriage owner	21.3%	35
Hackney Carriage driver	16.5%	27
Private Hire Vehicle owner	26.8%	44
Private Hire Vehicle driver	34.8%	57
Vehicle testing centre/inspector	2.4%	4
Private Hire Operator(s)	5.5%	9
Other (please specify)	3.0%	5
Other (please specify)		6
<i>answered question</i>		164
<i>skipped question</i>		1

Number	Response Date	Other (please specify)	Categories
1	Mar 2, 2012 3:42 PM	An officer of the council	
2	Mar 2, 2012 12:20 PM	Supply and fit taxi equipment, Taxi meters, Roof signs etc.	
3	Mar 1, 2012 11:06 AM	Spouse of Hackney Driver/Owner	
4	Dec 19, 2011 3:36 PM	Rent six cars to drivers	
5	Dec 12, 2011 1:03 PM	Former Civil Enforcement Office (NBC M15) & NCC & NCP (NP026)	
6	Dec 5, 2011 11:07 AM	officer of the Council	

Question 2.

Taxi Policy Consultation

Do you think that the age of a vehicle is related to its roadworthiness?		
Answer Options	Response Percent	Response Count
Yes	29.3%	48
No	67.1%	110
Don't know	3.7%	6
Comment		81
<i>answered question</i>		164
<i>skipped question</i>		1

Yes

- 1 Mar 2, 2012 3:42 PM But so are many other things. If roadworthiness is what matters, then it should be assessed directly rather than using another criterion which may be statistically related. If an inspection (the Council's or the MoT) shows that the vehicle is roadworthy, why rule it out on age grounds?
- 2 Mar 2, 2012 3:30 PM Most modern vehicles are good enough for at least 200,000 miles therefore whether the vehicle is hackney (black) taxi or private hire if maintained properly and roadworthy the age should not matter. Most cars today are better than black cabs and more comfortable. Sorry running out of space....
- 3 Mar 2, 2012 2:57 PM All vehicles are tested so have to be roadworthy to be a Private Hire vehicle
- 4 Mar 2, 2012 2:45 PM My car is 10 years old and passes MOT like a flash and drives like new car.
- 5 Mar 2, 2012 2:41 PM regular maintenance and servicing keeps any car roadworthy whatever its age, otherwise you wouldn't see any cars of old age on the road at all such as classic, vintage or 10 years old!
- 6 Mar 2, 2012 2:38 PM regular maintenance and servicing keeps any car roadworthy whatever its age, otherwise you wouldn't see any cars of old age on the road at all such as classic, vintage or 10 years old!
- 7 Mar 2, 2012 12:41 PM This depends on the type of vehicle. A saloon car used as a taxi or private hire will only last for a number of years before corrosion sets in. A purpose built hackney has a separate chassis and will last for many years if well maintained.
- 8 Mar 2, 2012 12:20 PM In general, an older vehicle, or high mileage vehicle will require more maintenance. However maintenance on newer cars tends to be more expensive.
- 9 Mar 2, 2012 11:51 AM Its not the age but the condition of the vehicle that is more important. Some of the new taxis with risky brakes and other faults and drivers drive with excess alcohol should be looked at.
- 10 Mar 2, 2012 11:27 AM People are not always able to afford the most modern cars to drive and if a car is old but is still running well it should be worthy on road.
- 11 Mar 2, 2012 11:21 AM Because these vehicles are thoroughly checked twice a year for mechanical fitness and for cosmetic condition
- 12 Mar 2, 2012 11:03 AM I think it depends more on the condition of the car rather than age.
- 13 Mar 1, 2012 11:33 AM As long as it passes MOT test it should be ok.
- 14 Mar 1, 2012 11:26 AM Not necessarily. Items such as tyres, brake pads, light bulbs can need to be replaced anytime.
- 15 Mar 1, 2012 11:06 AM A car/vehicle can be maintained well with full service history. Taxis are checked every 6 months. Surely that means that they are roadworthy. Its also down to the individual driver to maintain a certain standard during the day to day running and the council should be able to inspect/view the cleanliness of the vehicle both inside and out in town.
- 16 Mar 1, 2012 9:43 AM Of course not
- 17 Feb 29, 2012 12:19 PM vehicles on the whole are made much better today than they were say 30-40 years ago,
- 18 Feb 29, 2012 12:23 AM Improved manufacturing methods mean that the "rot boxes" that many cars became in the past - even before their first MoT test at three years old - are rarer than hen's teeth. It is not unusual to see cars older than ten years which, outwardly, show no significant signs of their

		<p>age, other than the inevitable and constant shifts in vehicle design. It is far more important to know that a vehicle is roadworthy and this should be addressed by the standard checks which take place. In this regard, private hire vehicles are no different to private vehicles - and the public can travel in either!</p> <p>The roadworthiness is related to</p> <p>a) the honesty and integrity of the vehicles owner, driver and or service agent.</p>
19	Feb 28, 2012 7:50 PM	<p>b) the usage of the vehicle i.e. town/local work, distance work, chauffeuring or wedding hire.</p> <p>c) the type of vehicle and its manufacturer.</p>
20	Feb 28, 2012 3:35 PM	<p>One could have Parts on a vehicle are subject to metal fatigue brought on by age, mileage, etc</p>
21	Feb 21, 2012 1:20 PM	<p>If a vehicle is roadworthy then the age should not matter</p>
22	Feb 20, 2012 8:38 PM	<p>If the vehicle is well maintained and ticks all the boxes with regard to the Council's requirements, then I think the age of the vehicle is irrelevant. Hackney carriages and private hire vehicles already have to pass vigorous safety/roadworthy tests twice a year. I would suggest that if the vehicle fails by 6 or more potential defaults then and only then the vehicle should be refused a new licence.</p>
23	Feb 20, 2012 3:53 PM	<p>If its roadworthy then it should be on the road</p>
24	Feb 20, 2012 3:40 PM	<p>not really as long as its looked after and serviced regularly its not a problem</p>
25	Feb 20, 2012 3:16 PM	<p>If vehicle is sound after MOT then it should be ok for roadworthiness</p>
26	Feb 20, 2012 10:52 AM	<p>Not looking after any vehicle do become this is a ble to cost lots of money to repair.</p>
27	Feb 20, 2012 10:11 AM	<p>Judge each vehicle on its own merits</p>
28	Feb 20, 2012 10:02 AM	<p>If the MOT has been passed and the vehicle has aligible road tax then it is roadworthy</p>
29	Feb 20, 2012 9:53 AM	<p>A well maintained vehicle can last many years</p>
30	Feb 20, 2012 9:42 AM	<p>yes but good condition looked after cars are just as safe as a new car and this very much should be taken into account</p>
31	Feb 20, 2012 9:28 AM	<p>Because we get MOT twice a year</p>
32	Feb 11, 2012 9:49 PM	<p>Any vehicle will deteriorate with age. The roadworthiness of any vehicle at any age is dependant upon the quality of the maintenance it receives. An exceptionally well maintained vehicle can be in a better condition than a poorly maintained vehicle half it's age.</p>
33	Feb 10, 2012 8:11 PM	<p>If a vehicle has passed the tast then it is fit to work. Most of the faults found at roadside checks relate to blown lightbulbs and tyres. These can happen with a taxi that is 6 months old.</p>
34	Jan 29, 2012 8:22 PM	<p>Provided the older vehicle is maintained and serviced and in perfect condition will be similar to a new vehicle.</p>
35	Jan 20, 2012 11:56 AM	<p>MATERIALS USED IN THE CONSTRUCTION OF A MOTOR VEHICLE ARE SUBJECT TO STRESS .</p> <p>SEE REPORTS FROM MOTOR INDUSTRY RESEARCH ASSOCIATION</p>

		DEFINITELY NOT..!!
36	Jan 19, 2012 4:01 PM	A well-kept 15 year old vehicle can be in a better condition than a poorly maintained 5 year old..!! Reading reports of vehicle defects found during spot roadside checks on both hackney carriages and private hire vehicles most of the defects appear to be attributed to poor maintenance standards and failure to do basic regular checks. Defective lights, reflectors, tyres appear a
37	Jan 16, 2012 10:43 PM	lot in these checks. All vehicles no matter how old they are must have frequent checks on the basic vital maintenance items such as oil, coolant, brake fluid and windscreen washer fluid levels and tyre condition and pressures. It is also important for the manufactures servicing schedules to be followed. It is important that operators pay attention to maintenance that affects exhaust emissions. If a vehicle is well maintained and passes the current
38	Jan 16, 2012 8:45 PM	MOT and council "Plate Test" there is no reason why it should not be allowed to be used as a Private Hire Vehicle. It is dependant on the make of the car for an example if is
39	Jan 13, 2012 10:11 AM	a mercedes it is known by specialists that this car can drive easy until 500,000 miles and still look in good condition and safe for passengers. The London Taxis are built for doing this job as it has to
40	Jan 13, 2012 9:15 AM	MOT twice a year and also it always stop check shouldnt be any limit as long as well maintained and go through MOT I think older vehicles require more maintence. Irrespective of the annual MOT there are many defects
41	Jan 11, 2012 4:11 PM	that arise the older a vehicle gets. I've been in Northampton cabs with ripped seats, door knobs and trim missing, and they still look at you expecting a tip!!!! I booked a taxi-cab from Weswtbridge motors to collect me from my home at Gayton to an appointment at Northampton General Hospital, when it arrived I saw that it was a Saloon Car, the driver was scruffily dressed,
42	Jan 11, 2012 4:02 PM	wearing boots with the laces undone, the passenger seat-well contained empty cigarette packets and take-away containers and the vehicle was in a dirty condition. I objected to the driver who simply shrugged, I didn't have time to obtain an alterative taxi so had to use it to keep to my appointment. private Hire vehicles are already MOT at a Higher
43	Jan 11, 2012 3:05 PM	standard than a normal car twice a year and mosat of our fleet are serviced regularly An older vehicle has more C02> While we are
44	Jan 11, 2012 2:49 PM	considering the age we have look carefully like what will be first reg of the vehicle. Recommended at least 4 years. Because regular maintenance is
45	Jan 11, 2012 2:36 PM	Because most important maintenance of car and presentation of car
46	Jan 11, 2012 2:26 PM	As long as it is well maintained. My own car not taxi 12 yrs old is immaculate air con everything. You can't tell difference. If a vehicle is properly maintained and worn body and interior parts replaced when required it will always remain roadworthy until the main structure starts to deteriorate.
47	Jan 10, 2012 10:58 AM	This condition would normally be picked up by the council tester, and if nessacary the license could then be revoked.,
48	Jan 2, 2012 11:08 AM	

49	Jan 1, 2012 6:53 PM	I think the roadworthiness is down to the person who owns or drives the vehicle
50	Dec 20, 2011 11:02 AM	Its maintenance of the vehicle
51	Dec 20, 2011 10:51 AM	Silly question. If the vehicle is not roadworthy it will not pass the test.
52	Dec 20, 2011 9:50 AM	One only has to look around at quite a lot of modern vehicles that leave a lot to be desired.
53	Dec 19, 2011 5:00 PM	Although there are those who will lovingly care for their vehicle and keep it well managed and in good condition - a good rule of thumb would be that age and roadworthiness is positively correlated.
54	Dec 19, 2011 3:53 PM	Some private Hire vehicles cover 100,000 miles per year. even a brand new vehicle can be dangerously unroadworthy in a matter of weeks. The crucial thing is proper maintenance.
55	Dec 19, 2011 3:36 PM	It's all about service
56	Dec 19, 2011 11:43 AM	The vehicle is tested 2 times a year. Its up to Jacksons to see fit.
57	Dec 18, 2011 3:29 PM	A lot of taxi's in Northampton are more than 5 years old this is a hazzard, some of them are not roadworthy and have lots of black smoke coming out of the exhaust the breaks are terrible the cars screech and some taxi's seem to have problems with the steering...
58	Dec 15, 2011 10:48 AM	A vehicle could do 30,000 plus in first year and could be on bald tyres. Surely the inspection twice a year is a sufficient indication of roadworthiness and not age.
59	Dec 15, 2011 10:32 AM	Maintennance carried out on an older car on a regular basis could be the same condition as a newer car without regular maintenance
60	Dec 15, 2011 10:19 AM	With plating twiwe a year and spot checks it should never be unroadworthy. No responsible drivers would risk injury to self and passengers driving a vehicle that was not roadworthy
61	Dec 14, 2011 12:39 PM	As long as vehicle is properly maintained and repaired correctly
62	Dec 14, 2011 12:12 PM	Depends on the how the car has been maintained
63	Dec 14, 2011 11:57 AM	I spent 12 years as a mechanic and this statement is untrue. Mileage of a vehicle is a better measuring stick. Good maintenance and regular inspection is the key not necessarily the age of the vehicle. I suppose some drivers dont have the level of care and competence to keep on top of maintenance, but why should the reasonably competent majority be mafde to suffer. The cost of regular car replacement will ultimately mean higher farres. Higher costs= higherfares=loss of affordable taxis=loss of work=less people in business=less revenue for drivers, operators and council
64	Dec 14, 2011 11:14 AM	Fitness is more important than age, quite a lot of newer cars are unsafe and unroadworthy in Northampton. Don't know how they get through the MOTs
65	Dec 14, 2011 10:07 AM	The standard of repairs to older vehicles is very often not to the standard of older ones.
66	Dec 14, 2011 9:53 AM	Vehicles well maintained will have no effect with ageing. Others not properly maintained will age quicker.
67	Dec 14, 2011 9:44 AM	The roadworthiness of a vehicle depends on how it has been driven and looked after by its owner/drivers. Age does not come into it.
68	Dec 13, 2011 5:12 PM	if there were no MOT concept then my answer was going to be yes

		The majority of companies that operate modern vehicles, But there are several around the town that are very much older.
69	Dec 12, 2011 1:03 PM	May I suggest that as part of the licence procedures & annual MOT tests, these vehicles MUST have a fully documented history for Safety Inspections & Servicing, as do ALL Passenger carrying vehicles, similar to what the NCC operate. Statistically old cars have more repairs carried out to pass an MOT or are more likely to be 'behind' economic repair at the time of an MOT. So following this logically,
70	Dec 9, 2011 9:06 PM	the old cars must have been driven for some period prior to the MOT in an unroadworthy or below MOT standard condition, because they could not have just developed to wear immediately prior to the MOT test.
71	Dec 8, 2011 2:04 PM	Tests should determine this.
72	Dec 7, 2011 10:21 AM	A person can have a three year old car and never look after it and drive over 100k a year, whilst another could have an 8 - 10 year old car, service it 6 monthly and only drive less than 12K a year I believe that each vehicle should have an annual stringent inspection which would cover all the requirements of road-worthiness, appearance, emissions, cleanliness, & provided it passed this the licence should be granted regardless of the age of the vehicle.
73	Dec 7, 2011 9:24 AM	
		Hackney Carriages are very expensive to purchase & so there should not be an added burden on their owners to replace them at a certain age regardless of their condition.
74	Dec 6, 2011 7:42 PM	taxis are by nature very high mileage vehicles. Therefore the quality of maintenance is more important than the age of the vehicle
75	Dec 6, 2011 11:38 AM	The older cars become the more unreliable they are, they become more expensive to run etc.
76	Dec 6, 2011 9:40 AM	There is no direct correlation. If you want to measure road worthiness, then inspect the vehicle for road worthiness.
77	Dec 5, 2011 5:13 PM	If the vehicle is serviced regularly and has an MOT, I would assume it to be roadworthy. I would be more interested in assuring it is serviced properly than in its age.
78	Dec 5, 2011 4:59 PM	Otherwise the current legislation regarding MOT's is wrong. Vehicle mileage and constant use - as some cabs are used virtually 24 hours a day - must also contribute to excessive 'wear & tear'. Provided a vehicle is serviced and maintained regularly and in accordance with manufacturer schedules then age is irrelevant in the motoring world today. A 5 year old vehicle owned by a local family can be in a worse condition than a 15 year old vehicle operated by a professional operator which is regularly serviced and inspected by the local authorities.
79	Dec 5, 2011 2:56 PM	
80	Dec 5, 2011 2:00 PM	But mitigated by maintenance regime - otherwise their would be a legal limit on the age of all road vehicles.
81	Dec 5, 2011 11:07 AM	But so are many other things. If roadworthiness is what matters, then it should be assessed directly rather than using another criterion which may be statistically related. If an inspection (the Council's or the MoT) shows that the vehicle is roadworthy, why rule it out on age grounds?

Question 3

Do you think that the age of a vehicle relates to its safety?		
Answer Options	Response Percent	Response Count
Yes	30.7%	50
No	65.0%	106
Don't know	4.3%	7
Comment		71
<i>answered question</i>		163
<i>skipped question</i>		2

Number	Response Date	Comment
		Yes
1	Mar 2, 2012 3:42 PM	But again, only indirectly. Modern cars have more safety features, but these could be defined directly (eg the car must have a front passenger airbag). If 'safety' here means 'roadworthy', see previous answer.
2	Mar 2, 2012 3:30 PM	See overleaf
3	Mar 2, 2012 12:41 PM	Goog regular maintenance is the key factor. A new vehicle that is badly maintained can be very unsafe.
4	Mar 2, 2012 12:20 PM	Not if it is properly maintained. However to be realistic, not all owners maintain their vehicles properly.
5	Mar 2, 2012 11:51 AM	The condition is more important than the age. An old vehicle that is well maintained is more safe than a newer vehicle that is not properly serviced.
6	Mar 2, 2012 11:27 AM	If a car is reliable and has passed a MOT then it is fine on road no matter what its age is.
7	Mar 2, 2012 11:21 AM	There are hundreds of cars, vans, buses on road which are older than 10 years and there is nothing wrong with them.
8	Mar 2, 2012 11:03 AM	Not necessarily. If you look after your vehicle it is safer.
9	Mar 1, 2012 11:33 AM	All this is checked at MOT
10	Mar 1, 2012 11:26 AM	Partially, but some older cars may still be more safe and crashworthy than some newer cars.
		Not a fair yes/no question.
11	Mar 1, 2012 11:06 AM	As long as the vehicle is maintained as ours are it is fine. The maintenance and upkeep should enable the vehicle to remain safe. It is also the drivers responsibility to drive safely and replace/repair damaged parts.
12	Feb 29, 2012 12:28 PM	More likely..
13	Feb 29, 2012 12:19 PM	New vehicles does have warranty period which can replace/repair easily. If its been looked after and taken care of there's no reason why it shouldnt be as safe as it was new.

- 14 Feb 29, 2012 12:23 AM A car which has clocked up a high mileage in its first year in the hands of an irresponsible owner who has never checked the tyres, brakes, lights or fluid levels could be extremely unsafe. This scenario may be unlikely, but it is not unfeasible. At the other end of the scale, modern day cars can clock up huge mileages which, provided they are regularly maintained, are no barrier to those vehicles passing the annual MoT and any additional testing private hire vehicles may face. I travelled in a Mercedes E300D private hire vehicle two years ago. It had over 320,000 miles on the clock and looked and felt like a car with just one tenth of that mileage.
- 15 Feb 28, 2012 7:50 PM Comment 2. also applies.
- 16 Feb 28, 2012 3:35 PM As previously stated, the current state of repair of roads, speed humps etc all have an effect on safety
- 17 Feb 20, 2012 8:38 PM See above
- 18 Feb 20, 2012 3:53 PM We have 2 MOT tests per year
- 19 Feb 20, 2012 3:40 PM thats why we set them MOT twice a year
- 20 Feb 20, 2012 3:20 PM Condition of the car.
- 21 Feb 20, 2012 3:16 PM If PH vehicle has reached 12 years old maybe its safety becomes an issue
- 22 Feb 20, 2012 10:52 AM Wear and teat of the times its take toil on any vehicle
- 23 Feb 20, 2012 9:53 AM Safety is down to good maintenance and careful driving.
- 24 Feb 20, 2012 9:42 AM If a car is roadworthy then I think it is safe. A car that is safe for me may not be so for someone with a very expensive budget.
- 25 Feb 20, 2012 9:28 AM As long as its roadworthy
- 26 Feb 11, 2012 9:49 PM Vehicle manufacturers continually add new or enhanced safety features, which wil add to the overall safety of a vehicle provided these features are not used by the operator as an excuse for careless or dangerous operation of the vehicle.
- 27 Feb 10, 2012 8:11 PM Not if it is correctly maintained,and see my comments for the previous question.
- 28 Jan 29, 2012 8:22 PM Within reason (e.g. since 2000) a vehicle with modern safety (airbags, ABS etc) maintained and serviced and in perfect condition will be similar to a new vehicle.
- 29 Jan 20, 2012 6:43 PM you could have new one and become unsafe
- 30 Jan 20, 2012 11:56 AM MODERN VEHICLES ARE MUCH SAFER
- 31 Jan 19, 2012 4:01 PM Age has NOTHING whatsoever to do with safety on a properly maintained vehicle.
- 32 Jan 16, 2012 10:43 PM My short answer to this is no, my general comments on this are broadly in line with those in Q2. Although features that improve vehicle safety could have been introduced to all newer vehicles it is probably unlikely that over a span of 8 years the oldest vehicles would be substantially behind in terms of overall safety.
- 33 Jan 16, 2012 8:45 PM But not necessary a risk to passengers, newer vehicles will have higher safety specks as improvements are made by manufactueres
- 34 Jan 13, 2012 10:11 AM .As long as MOT is followed by NBC every 6 months the vehicle will be safe.
- 35 Jan 13, 2012 9:15 AM Not always, especially this LT taxi strong built motor, design to last long.
- 36 Jan 11, 2012 4:11 PM I had a drive shaft litteraly snap on a 10 year old vehicle. Luckily i was only pulling away from a junction. if that was on the A45 at 60+ mph i would not be here now. The mechanic said it was metal fatigue and would not have shown up at a service or MOT. Imgaine that being a 7-10 year old taxi....

		I believe that mechanical parts wear-out irrespective of body condition and appearance
37	Jan 11, 2012 4:02 PM	
		I was a traffic Manager for many years, I am now 76 years old and been a driver since I was 16
38	Jan 11, 2012 3:05 PM	See previous (2)
39	Jan 11, 2012 2:49 PM	Vehicle is being checked very often as private hire vehicle. Its being checked every now and then.
40	Jan 11, 2012 2:36 PM	As before. 10k full service essential
41	Jan 11, 2012 2:26 PM	It not maintenance of cabs even new cabs can go wrong anytime
42	Jan 10, 2012 10:53 AM	safety is dependant on maintenance and general care of the vehicle and also its driver
43	Jan 1, 2012 6:53 PM	see above answer
44	Dec 20, 2011 10:51 AM	.Simply because of the 6 monthly test, if a vehicle is deemed to be unsafe it will not pass
45	Dec 20, 2011 9:50 AM	Have seen many multiple driver fgairly new vehicle in a poorer state than older cars and hackneys in the last twenty five years
46	Dec 19, 2011 5:00 PM	
47	Dec 19, 2011 3:53 PM	Assuming this refers to road safety. Milage would seem a better measure.
48	Dec 19, 2011 3:36 PM	If it did there would be no point in haveing a vehicle test.
49	Dec 18, 2011 3:29 PM	It's all about service
50	Dec 15, 2011 10:48 AM	AS STATED ABOVE. Also if the breaks screach every time you use them then surely they are not able to stop in an emergency..
51	Dec 15, 2011 10:32 AM	Surely the WAY the vehicle is driven is more important
52	Dec 15, 2011 10:19 AM	See comment 2
53	Dec 14, 2011 12:39 PM	.See previous
54	Dec 14, 2011 12:12 PM	As long as vehicle is properly maintained and repaired correctly
55	Dec 14, 2011 11:57 AM	Depends on the way the car has been maintained and what it is used for
56	Dec 14, 2011 11:14 AM	A new car is likely to be more safe but only up to a point of about 70,000 miles. Then safety partly relies on good inspection, maintenance, driver awareness.
57	Dec 14, 2011 10:07 AM	Not at all
58	Dec 14, 2011 9:44 AM	The more modern the vehicle the higher the Euro N Cap rating is so ensuring better safety features as standard e.g. ABS traction/stability control, more airbags etc.
59	Dec 13, 2011 5:12 PM	Again this is down to how it is looked after and maintained.
60	Dec 12, 2011 1:03 PM	MOT once again proves that vehicle is enough safe for itself
61	Dec 9, 2011 9:06 PM	The majority of recently operating vehicle, that were stopped in a Police operation were found to have defects, some quite serious, thus potentially putting the customers at risk of serious injury or death.
62	Dec 8, 2011 2:04 PM	Modern vehicles are designed to reduce injury to anything they collide with, and to reduce injury to the passengers and driver.
63	Dec 7, 2011 10:21 AM	Modern design improves vehicle safety
64	Dec 7, 2011 9:24 AM	Similar as above. If someone looks after their car regularly and properly, then the car is more likely to be safer than someone who drives alot, erratically, and never services it properly.
65	Dec 6, 2011 7:42 PM	Providing the vehicle is serviced & kept in good condition I do not think the age of the vehicle relates to its safety.
		yes but only in the broadest sense, in that a 40 year old vehicle would much less safe intrinsically, than a newly produced model.
		The most important factor in road safety is the skill and care of the driver. Regular observations and training of drivers would improve passenger

safety

The cars have safety to checks to assess their road worthiness and thus their safety. This is much more appropriate than assuming a direct correlation between age and safety.

66 Dec 6, 2011 9:40 AM

In the background information, it is asserted that many other councils have implemented vehicle age limitations; is there any evidence of an improvement in safety? None seems to be referenced.

67 Dec 5, 2011 5:13 PM

Again I assume that current safety rules, or any new safety regulations, have to be adhered to regardless of the age of the vehicle.

68 Dec 5, 2011 4:59 PM

I repeat: Otherwise the current legislation regarding MOT's is wrong. Vehicle mileage and constant use - as some cabs are used virtually 24 hours a day - must also contribute to excessive 'wear & tear'.

69 Dec 5, 2011 2:56 PM

As above comment. Vehicles are inspected every 6 months so no major safety issues should occur and prohibition can be used where necessary.

70 Dec 5, 2011 2:00 PM

But mitigated by maintenance regime - otherwise their would be a legal limit on the age of all road vehicles.

71 Dec 5, 2011 11:07 AM

But again, only indirectly. Modern cars have more safety features, but these could be defined directly (eg the car must have a front passenger airbag). If 'safety' here means 'roadworthy', see previous answer.

Question 4.

Should Northampton Borough Council Licensing Authority adopt age limits that are common to both Hackney and Private Hire Vehicles?		
Answer Options	Response Percent	Response Count
Yes	38.0%	62
No	58.3%	95
Don't know	3.7%	6
Comment		69
<i>answered question</i>		163
<i>skipped question</i>		2

Number	Response Date	Comment
1	Mar 2, 2012 3:42 PM	No
2	Mar 2, 2012 2:57 PM	I'm not convinced that age limits as such are necessary We do the same work taking members of the public around town so the same rules should apply.
3	Mar 2, 2012 2:51 PM	No more than 10 years old
4	Mar 2, 2012 2:45 PM	Not at all as long as passes the strict MOT.
5	Mar 2, 2012 2:41 PM	Against age limits but both should be treated equally.
6	Mar 2, 2012 2:38 PM	Against age limits but both should be treated equally.
7	Mar 2, 2012 12:41 PM	Private Hire are just normal cars. A purpose built hackney is made to do many 100,000's miles if regularly serviced.

8	Mar 2, 2012 12:20 PM	Many of the Hackney vehicles are modified versions of the same vehicle used as private hire. Mechanically identical. Age limits should be similar.
9	Mar 2, 2012 11:51 AM	LTI are built for safety, longer lasting than private cars.
10	Mar 2, 2012 11:27 AM	As above
11	Mar 2, 2012 11:21 AM	Hackneys are purpose built, long lasting and huge investment money wise compared to private Hire vehicles - AND IT IS STUPID TO APPLY THE SAME AGE LIMIT FOR THEM.
12	Mar 2, 2012 11:03 AM	No age limit
13	Mar 1, 2012 12:05 PM	All taxis built on a chassis can be rebuilt. Taxis built on a subframe can receive irreversible damage.
14	Mar 1, 2012 11:33 AM	Because Black Cab cant be compared with saloon cars have traditional TX type taxi cabs been subject to NCAP test etc.
15	Mar 1, 2012 11:26 AM	Traditional Taxi Cab may be less safe and crashworthy than equivalent age passenger car. Therefore the logical outcome of this review is to include traditional taxi cabs.
16	Mar 1, 2012 11:06 AM	private Hire vehicles are different to Hackney vehicles. Private Hire should have an age limit as they are smaller and have a great deal of wear and tear. Hackneys are a symbol of tradition and are an older vehicle such as a fairway model can be maintained. Obviously if it fails MOT it should not be used.
17	Mar 1, 2012 9:43 AM	Hackney Carriage (London Cabs) are built to last.
18	Feb 29, 2012 12:23 AM	Allow first time private hire vehicles up to five years old, possibly with a maximum mileage and subject to a thorough check of the vehicle's service and maintenance history.
19	Feb 28, 2012 7:50 PM	Under normal circumstances one would recommend a 10 year age limit for PHV's and 15years for HC's. However, there are a considerable number of HC's that are relatively speaking 'new' to the industry and their build quality and reliability is suspect and not yet proven.
20	Feb 28, 2012 3:38 PM	For private hire should be 5 years from first time
21	Feb 28, 2012 3:35 PM	Hackney carriages specially built for the trade. Private cars are not. There is currently an 11 year old sporty type astra with alloy wheels and metallic silver in colour. Not a good advert.
22	Feb 20, 2012 8:38 PM	Age limits should be imposed as a guideline only. Vehicles should be judged on their own performane and maintenance record. If an individual vehicle is deemed to be unsafe/unroadworthy by an individual qualified expert on its bi-annual inspection, then the vehicle will be deemed to have failed the test and a licence refusal should be issued or a warning given to the owner/driver that he must bring the vehicle to the required standard or replace it.
23	Feb 20, 2012 3:53 PM	If its age limits adopt then its should be for both.
24	Feb 20, 2012 3:40 PM	With the recession its very difficult to buy a new car. Business is very slow at the moment. Where will we get the funds.
25	Feb 20, 2012 3:16 PM	Only if PH vehicle is maybe 10 years old
26	Feb 20, 2012 10:52 AM	Because Hackeny Carriage are made for public use. Private Hire vehiclesa are family saloon vehicle there should be age and time difference
27	Feb 20, 2012 9:53 AM	Note: the age restriction that applies in Northampton for Hackney Carriage vehicles are only there because the HCA asked for them
28	Feb 20, 2012 9:28 AM	Because Hackney vehicles are purpose built
29	Feb 14, 2012 8:13 PM	Hackney carriage are more roubust and porpuse built taxi
30	Feb 11, 2012 9:49 PM	Any applied age limits should be common to both Hackney and Private Hire vehicles.
31	Feb 10, 2012 8:11 PM	If you were to look underneath a black cab you would see it is built in a totally different way to a modern car or van.It is built on a very strong seperate chassis,like a truck,not a pressed steel shell like a car.

32	Jan 29, 2012 8:22 PM	Hackneys are purpose designed for the job and as such should be expected to give longer service. They are also greater capital investment.
33	Jan 20, 2012 6:43 PM	drivers do not have the fund to buy new cabs with out going into debt and as long as they pass all requirements and road worthy HACKNEY CARRIAGES ARE CONSTRUCTED FOR THEIR USE AND SHOULD (SUBJECT TO PROPER MAINTENANCE) HAVE A LIFE OF 20 YEARS FROM 1st. REGISTRATION.
34	Jan 20, 2012 11:56 AM	PRIVATE HIRE (UNLESS PROPER HACKNEY CARRIAGE) MAX . 10 YEARS. For what reason.
35	Jan 19, 2012 4:01 PM	What benefits are there...?
36	Jan 16, 2012 10:43 PM	It's a complete waste of time and money (ours!!!) Subject all vehicles passing the Licensing Authority inspections and operators showing evidence of regular servicing.
37	Jan 16, 2012 8:45 PM	It is only right that both types of vehicles are treated equally.
38	Jan 13, 2012 10:11 AM	I personally think it is good to have a new vehicle to drive also to give the best we can to our passengers. However by adopting the age limit we will punish many good drivers which is not fair
39	Jan 13, 2012 9:15 AM	Definitely in private hire should be a limit and size of engine for comfort.
40	Jan 11, 2012 4:11 PM	See above. It's a no brainer. I accept that Hackney cabs have to be built to a higher standard for hire work and that an additional two years would-not be unreasonable to their working life.
41	Jan 11, 2012 4:02 PM	
42	Jan 11, 2012 2:49 PM	Age limits can be adopted but have to consider the 1st registration of the year. At least four years.
43	Jan 11, 2012 2:36 PM	Would be unfair to Hackney drivers
44	Jan 11, 2012 2:26 PM	Most important the customer service is cabs properly maintenance. the driver or owner and no better the car what will happen?
45	Dec 20, 2011 11:02 AM	Only not disable friendly
46	Dec 20, 2011 10:51 AM	If age is an issue for purpose built vehicles many of the buses would not be suitable
47	Dec 20, 2011 9:50 AM	Supposedly a purpose built LT1 vehicle is built to last longer than a mass produced private hire vehicle perhaps not so on the converted van fleet of hackneys now permitted to operate.
48	Dec 19, 2011 3:53 PM	Why not? Your assumption that Hackneys are more sturdily built immediately disqualifies all the Hackneys other than TX's and metros. the Peugeots, Mercedes, V.W's and Fiats all being conversions from standard vehicles.
49	Dec 18, 2011 3:29 PM	5 years if possible or up to 8 at a push, but will stop any old driver driving a damaged unroadworthy car!
50	Dec 15, 2011 10:54 AM	Private Hire as they are not purpose built
51	Dec 15, 2011 10:19 AM	Totally different type of vehicles
52	Dec 14, 2011 12:12 PM	Equality should apply If an age limit on one then the same should apply to the other. There should be a level playing field. Hackneys private hire both pay same fees to council so they should have same terms and conditions. If parity and equality on age then there should be parity and equality to all areas therefore private hire should be able to use taxi lanes and be able to pick up off street.
53	Dec 14, 2011 11:57 AM	
54	Dec 14, 2011 11:14 AM	If they do should be lenient

55	Dec 14, 2011 10:29 AM	All rules should be the same for taxi and private hire with the exception of being able to be able to ply for hire in a public place.
56	Dec 14, 2011 10:07 AM	hackney carriages should have an extra two year life cycle.
57	Dec 14, 2011 9:44 AM	If age limits are introduced then there should be a level playing field.
58	Dec 13, 2011 5:12 PM	not needed in this huge recession period, where the drivers will bring money to fulfill borough council demand
59	Dec 12, 2011 1:03 PM	The are a pprox 300 plus Private Hire Vehicles, all bidding for work that is reducing due the economical climate. The Hackney vehicles should be capped at say 60 vehicles. The reduction in Private Hire would thus allow the Hackney drivers to become more viable. As well as the clear safety issues relating to older cars, there are issues of poorer emissions, and considering that we are considering taxis, they are very likely to do more mileage than an average car, and as such will cause more pollution.
60	Dec 9, 2011 9:06 PM	
61	Dec 9, 2011 4:24 PM	Another aspect of old private hire cars, is the image it portrays of our town. Some of our embarrassingly old private hire cars cannot provide a vibrant image of our town and could affect potential investment. they both do the same job, but H K are owner run but private hire have many drivers Hackney Carriages are built to last longer and take more of a hit. The reason they cost more is attributable to this fact. Hackneys and Private Hires are two different leagues.
62	Dec 7, 2011 10:21 AM	
63	Dec 6, 2011 7:42 PM	However, the newly plated Hackneys which are not the usual black cabs could be subject to the same age limits (if applicable)
64	Dec 6, 2011 11:38 AM	See 2 above
65	Dec 6, 2011 9:40 AM	Cars should be a max of 5 years old.
66	Dec 5, 2011 5:13 PM	There is no reason given why having common age restrictions is, in itself, a good thing. If it is, then relaxing the age restrictions on Hackneys would have equal merit.
67	Dec 5, 2011 4:59 PM	If an age limit is adopted I do think it should be common to all taxis. As a regular 'cab' user who uses both Hackney and Private Hire I have experienced some appalling vehicles and some equally appalling driving - however, vehicles with poor brakes and poor suspension seem to me to be far too common in Northampton.
68	Dec 5, 2011 2:00 PM	There should be no limits, just appropriate and checked maintenance/condition regime
69	Dec 5, 2011 11:07 AM	I'm not convinced that age limits as such are necessary.

Question 5.

If Northampton Borough Council Licensing Authority was to introduce age limits, do you think the proposed age limits are correct?		
Answer Options	Response Percent	Response Count
Yes	19.8%	32
No	70.4%	114
Don't know	9.9%	16
Comment		61
<i>answered question</i>		162
<i>skipped question</i>		3

Number	Response Date	Comment
1	Mar 2, 2012 3:42 PM	Don't know
2	Mar 2, 2012 12:41 PM	Impossible to answer, as I don't think it should I run an old taxi. The body is glass fibre. It has a seperate chassis. I think it runs better as it gets older because nothing is original. Running parts have all been replaced.
3	Mar 2, 2012 12:20 PM	Should just be an upper age limit for both Hackney and Privat Hire. Having a lower to upper age limit would just promote higher mileage vehicles. The value of higher mileage vehicles would be inflated (already plated). Max of 10 years only.
4	Mar 2, 2012 11:51 AM	Especially not on Hackney carriages. These vehicles are built to last longer.
5	Mar 2, 2012 11:21 AM	Not now - earnings are 60-70% less so wait until country is out of worse business conditions. THERE IS NO WORK OUT THERE.
6	Mar 1, 2012 11:33 AM	Maybe for Private Hire but not for Black Cabs.
7	Mar 1, 2012 11:26 AM	Not convinced age limits are necessary for reasons explained elsewhere.
8	Mar 1, 2012 11:06 AM	I think Private Hire should have an age limit as they are a normal car but a hackney is a purpose built vehicle. This will affect peoples livelihood and in the current climate people cannot afford new cars or get finance to help them. many vehicles will need to be scrapped. Will they get compensation from the council? Hackneys are more expensive than private hire.
9	Mar 1, 2012 9:48 AM	As the vehicles are serviced and MOTd regularly age is almost irrelevant. Age limit should be
10	Feb 29, 2012 12:28 PM	4/5 years from registration
11	Feb 29, 2012 12:19 PM	6 years on road. I drive a 9 seaterr mini-bus. I won't be able to buy one under 3 years old for less than £20,000. If then I have to buy another one when its eight years old it won't be affordable.
12	Feb 29, 2012 12:23 AM	Allow private hire vehicles up to ten years old, possibly subject to a maximum mileage, with the right to revoke a vehicle's plate in individual cases where there are concerns that the vehicle has fallen outside the specification due to wear, accident damage, etc.
13	Feb 28, 2012 3:35 PM	Hackney carriages should have a longer life than private cars.
14	Feb 20, 2012 8:38 PM	Hackney Carriages and Private Hire vehicles should be equally regulated. i.e. no more than 3 years old on the date of first registration with Northampton Borough Council. yes - First time will be no more than 3 years old
15	Feb 20, 2012 3:53 PM	PHV license for further 5 years ok
16	Feb 20, 2012 3:40 PM	Hackney license for further 12 years ok I think they are too high. I think 5 years will do.
17	Feb 20, 2012 10:52 AM	Both vehicle are made from different use there must be years gap between both vehicle.

18	Feb 20, 2012 9:53 AM	The age for the upper limit should be set at 10 years. The age of the vehicle when first used as a private hire should not be taken into consideration.
19	Feb 20, 2012 9:42 AM	I think Hackney should be 12 years and private Hire 10 years if they pass MOT
20	Feb 20, 2012 9:33 AM	It should be 10 years
21	Feb 14, 2012 8:13 PM	Hackney carriage are bought on finance and it takes 5 to 7 yrs to pay off . It would be unfaire and unjust for us as a hackney carriage driver .
22	Feb 11, 2012 9:49 PM	The real issue is roadworthiness and safety and perhaps these should be used as boundaries for acceptable vehicles. Ageing vehicles would be increasingly less likely to meet required standards.
23	Feb 10, 2012 8:11 PM	As a black cab can work in London for 10 years and then can carry on working subject to 3 monthly plating checks it seems ridiculous to think that the same vehicle is not fit to work in Northampton after 8 years.
24	Jan 20, 2012 11:56 AM	SEE ABOVE
25	Jan 19, 2012 4:01 PM	If introduced, by definition you are saying that an 8yr. old vehicle is perfectly OK to use, but 8yrs and 1 day it is not, and should be scrapped.
26	Jan 16, 2012 10:43 PM	What complete and utter nonsense! Probably about right for vehicles that do a fairly high mileage.
27	Jan 16, 2012 8:45 PM	The limits being suggested are more stricter than what is being sugested nationally, and no other council in Northamptonshire has these limits.
28	Jan 13, 2012 9:15 AM	More workable limits would be under 5 years at first plate and allowed to be plated till 10 years old this is in line with the National average. Note a normal vehicle will do on average 60,000 miles in five years this is approximately 25% more than a Private Hire Vehicle with one full time driver will complete in a year.
29	Jan 11, 2012 4:02 PM	This will be very bad move many driver will be out of job. May cause more burden in local economy. I would suggest 8years for Private hire and 10years for Hackney cabs with a uniform colour for each type of vehicle.
30	Jan 11, 2012 3:05 PM	Questions seem loaded
31	Jan 11, 2012 2:49 PM	My view is is should be 4 years.
32	Jan 11, 2012 2:36 PM	5 years old would be fairer
33	Jan 11, 2012 2:26 PM	because to life and death never be ??????. same way new cabs and old cabs any time will be stopped. Only depends who is best luck.
34	Jan 10, 2012 10:53 AM	Due to the imposed mandatory plating/MOT testing the majority of taxi/private hire vehicles are far safer and roadworthy than many privately owned vehicles that are less than half the age of taxis even taking into consideration mileage.
35	Jan 1, 2012 6:53 PM	I think the age for the first test on private hire cars should be 2 years
36	Dec 20, 2011 11:02 AM	Itsa too easy or unthinkable decision.
37	Dec 20, 2011 10:51 AM	If a vehicle is structurally safe and aesthetically acceptable, then there is no reason for criteria to change.

- 38 Dec 20, 2011 10:39 AM private should be 8 years
- 39 Dec 20, 2011 9:50 AM hackney should be 12 years
For reasons above
- 40 Dec 20, 2011 9:27 AM No more than 5 years old from 1st registration. A further 5 years to renew, altogether 10 years instead of 8yrs.
- 41 Dec 19, 2011 5:00 PM These seem reasonable.
- 42 Dec 19, 2011 3:53 PM Any age limit is arbitrary - the only possible justification is 'image', which can never replace 'quality'.
- 43 Dec 19, 2011 3:36 PM 8 years should be 8 years. i.e. new or first plate anytime in 8 years. Not must be less than three years as this inflates the value of second hand taxis
- 44 Dec 15, 2011 10:32 AM 3 years is a bit disengenious to operators and place a financial burden on them which cannot be met in times of austerity. 5 years would be more realistic and achievable. Adopting to encourage a 3 year policy will actually result in more pollution when taking into consideration the manufacturing of cars.
- 45 Dec 15, 2011 10:19 AM Depends on make and model. there are a lot of pristine older mercedes for example
- 46 Dec 14, 2011 12:12 PM It is not. This would mean putting many private hire owners and drivers out of business.
- 47 Dec 14, 2011 11:57 AM Maybe mileage would be more appropriate. some drivers are not busy enough for the proposed limit to be affordable. If I buy a car at three years, keeping it for 5, if I'm a part-time low mileage user then an age limit is rather unfair.
- 48 Dec 14, 2011 11:14 AM Perhaps 12 years or more
- 49 Dec 14, 2011 10:29 AM Its about time age limits came in for mboth provate hire and hackney and I feel 10 year rule is right and fair
- 50 Dec 14, 2011 10:19 AM 10 years Private Hire
- 51 Dec 14, 2011 10:07 AM 12 years hackney carriage
10 years is probably more realistic
I don't agree that there could be a lower age limit, especially in the current financial climate.
- 52 Dec 14, 2011 9:44 AM I think an upper age limit should be introduced but at 10 years and not 8.
- 53 Dec 13, 2011 5:12 PM My proposal would be that a car of any age up to 10 years old could be introduced as new at any time
if borough council agrees to lend loan which could be from 10 to 14 k for the prescribed age limit car then i dont think its a bad idea
- 54 Dec 12, 2011 1:03 PM In my opinion the vehicles should be limited to a maximum of 5 years of age for Private Hire, They ALL should be either painted the same colour, so that the public know that it's not just a car driver trying to get some extra money by using his own car, without the need to register, Insure or have a FULLY Enhanced CRB Certificate.
- The alternate is to have a wide band running the length on the vehicle on both sides saying PRIVATE HIRE. This would save the need to have the vehicle sprayed to one colour. But make a mandate that with in the next 5 years ALL Private Hire cars must be ONE COLOUR.

55	Dec 9, 2011 9:06 PM	7 years of age on all private hire, and no age on Hackney carriage.
56	Dec 8, 2011 2:04 PM	Too severe There should definitely be an upper age limit of 10 years maximum, but the lower age limit should be higher than 3 years.
57	Dec 7, 2011 10:21 AM	
58	Dec 6, 2011 9:40 AM	Also, there should be other rigorous tests to check if a vehicle is roadworthy or not, not just age. No evidence has been given to show how safety is improved by having younger vehicles, or, therefore at what age vehicles become 'unsafe'. In the absence of any evidence, the proposed age can therefore at best be an arbitrary guess.
59	Dec 5, 2011 10:19 PM	There is no evidence for this choice
60	Dec 5, 2011 6:57 PM	The current method of testing the cars every 6 months should be sufficient to ensure that cars are in good condition mechanically and aesthetically.
61	Dec 5, 2011 11:07 AM	Impossible to answer, as I don't think it should!

Question 6.

Do you think Northampton Borough Council Licensing Authority should have exemptions from the age limit for vehicles that are in exceptional condition and have low mileage?		
Answer Options	Response Percent	Response Count
Yes	53.0%	87
No	37.2%	61
Don't know	9.8%	16
Comment		56
<i>answered question</i>		164
<i>skipped question</i>		1

Number	Response Date	Comment
		No
1	Mar 2, 2012 3:42 PM	The vehicles have to be 'immaculate' already. You can't get any better than that - immaculate means faultless.
2	Mar 2, 2012 2:45 PM	All cars must be safety checks
3	Mar 2, 2012 2:41 PM	If a car is not roadworthy, remove it, but age does not apply all the time.
4	Mar 2, 2012 2:38 PM	If a car is not roadworthy, remove it, but age does not apply all the time.
5	Mar 2, 2012 12:41 PM	I think this depends on the garage that tests the vehicle and what is meant by low mileage.
6	Mar 2, 2012 12:20 PM	Would have to exception for specialist vehicles. Proper limousines for example. Wedding cars for another. Vehicles that would not be used for regular taxi work.
7	Mar 2, 2012 11:51 AM	As Taxis have special MOT test. I think if a taxi passes its test 100% the taxi should not be looked at its age. Tell the testing centre to be a bit more strict.
8	Mar 2, 2012 11:27 AM	If a car is in good condition and has low mileage then yes why not.
9	Mar 2, 2012 11:21 AM	Only if you have to go along these lines.
		In fact, scrap this idea all together of applying age limits.

10	Mar 2, 2012 11:03 AM	But I only agree if I know the exceptional condition
11	Mar 1, 2012 12:05 PM	Although since LTI taxis can be stripped back to its chassis and rebuilt with all new parts then surely a taxi does not grow old, only its parts do which can be replaced.
12	Mar 1, 2012 11:33 AM	Conditions are checked in MOT and black cabs are built to do high mileage.
13	Mar 1, 2012 11:06 AM	However a high mileage vehicle is ?????? as Hackneys are designed for this Kind of work. It is believed and is inevitable that taxis will have a high mileage. Stringent MOT procedures will decide which vehicles are roadworthy not the numbers on the speedometer.
14	Feb 29, 2012 12:19 PM	If taxis are being plated every six months they should be in exceptional condition anyway. I don't know how you can have a taxi on low mileage. I just do a nschool run and clock up about 15,000 miles per year.
15	Feb 29, 2012 12:09 PM	If you bring in this option you could end up being intercepted by the individual making the decision. If it is clearly defined then it would be ok.
16	Feb 29, 2012 12:23 AM	For similar reasons to those expressed in the comments to question 2, although a common sense adaptation of the proposed changes outlined in the responses to questions 4 and 5 should reduce the number of exceptions encountered.
17	Feb 28, 2012 7:50 PM	Chauffeuring work using limousines that originally are more expensive for new/nearly new/ low mileage would become prohibitive to purchase if a 3 year age limit were to be imposed.
18	Feb 28, 2012 3:35 PM	Older limousines subject to your exemption parameters.
19	Feb 20, 2012 8:38 PM	All vehicles, regardless of age or mileage, if well maintained, should have equal status.
20	Feb 20, 2012 10:52 AM	Because of how used or single shift work vehicle
21	Feb 20, 2012 10:11 AM	Age limit is irrelevant. Judge each vehicle on its own merits.
22	Feb 20, 2012 9:53 AM	Surely this would make a mockery of the rules and regulations regarding age limits
23	Feb 11, 2012 9:49 PM	Yes, provided they satisfy the regulations for roadworthiness and safety current at the time of assessment / application for continued use.
24	Feb 10, 2012 8:11 PM	If a vehicle passes the test it is fit to work. A vehicle that is in exceptional condition, serviced & maintained in that condition is equal to a new vehicle.
25	Jan 29, 2012 8:22 PM	There is an environmental impact in manufacturing new vehicles. Therefore, taking perfectly serviceable vehicles off the road may well be detrimental to the environment.
26	Jan 19, 2012 4:01 PM	As long as the vehicle is clean, tidy and passes current MoT criteria, age is immaterial.
27	Jan 16, 2012 10:43 PM	Subject to the operator being encouraged to do their best to maintain the engine and engine systems to a very high standard so as to keep exhaust emissions as low as possible.
28	Jan 16, 2012 8:45 PM	This would be open to abuse, low milage does not mean the vehicle has been well maintained.
29	Jan 13, 2012 10:11 AM	As I said in question 2 it depends on models of cars which can be exceptional
30	Jan 13, 2012 9:15 AM	Should set limit on mileage and age of all car in private hire. It is a ordinary built for everyday use.
31	Jan 11, 2012 4:02 PM	Yes, it could be possible to do that but difficult to decide where to draw the line.
32	Jan 11, 2012 3:05 PM	If age limit is adopted
33	Jan 11, 2012 2:26 PM	New cabs will breakdown and customer will get problem. Then mileage not give anything to customer

34	Jan 10, 2012 10:58 AM	Taxis won't have a low mileage if they are busy, but most are not busy as there are many cars chasing work because council giving too many badges.
35	Dec 20, 2011 11:02 AM	Its fair as I think
36	Dec 20, 2011 10:51 AM	Contradictions. Because of the nature of the job they do, you cannot have an aged vehicle with low mileage. It is rare to have vehicles of 10 yrs plus to have the original components (engine, gearbox, etc)
37	Dec 20, 2011 10:39 AM	Only in special circumstances i.e. 10 yr old Hackney in v good condition gets written off in an accident (rare!) then able to replace with a similar age one if low mileage.
38	Dec 20, 2011 9:50 AM	Seen vehicles with high mileage that are in good condition
39	Dec 20, 2011 9:27 AM	It should be the same for every vehicle
40	Dec 19, 2011 5:00 PM	Assuming there were a way to accurately assess the condition.
41	Dec 19, 2011 3:53 PM	The condition of the vehicle is everything. Either its good enough or it isnt. Mileage is irrelevant.
42	Dec 18, 2011 3:29 PM	to be under a official agreement
43	Dec 15, 2011 10:19 AM	As above but mileage should relate to make and model. Some diesels will take heavy mileage without undue problems
44	Dec 14, 2011 10:29 AM	There should be no exemptions at all as I feel this creates loopholes.
45	Dec 14, 2011 10:07 AM	No just stick to one thing otherwise it all starts again.
46	Dec 14, 2011 9:44 AM	It should be a level playing field for everyone.
47	Dec 13, 2011 5:12 PM	law should be equal for all
48	Dec 12, 2011 1:03 PM	To make one rule for one person / company is a DOUBLE STANDARD
49	Dec 9, 2011 9:06 PM	Yes, because this will allow for the 'Novel or Quirky' party/event, and help generate business and development; But the Council MUST have the right to refuse with the only right of appeal in exceptional circumstances.
50	Dec 9, 2011 4:24 PM	vehicles with low mileage are they really providing the service the community requires of a taxi service or is it used just to suit the owner???
51	Dec 7, 2011 10:21 AM	Again it is all down to how the vehicle is looked after. However, if the car is of an old age (above the higher age limit) but of low mileage, should it fail the MOT on first occasion (save for lights and wipers), then this should not be allowed to be a vehicle that serves the public. Alternative is to work with insurance company and ensure a higher type of cover is given to ensure safety of customers, to allow it to qualify for a a plate.
52	Dec 6, 2011 7:42 PM	Condition is important - The driver however is key!!!
53	Dec 6, 2011 9:40 AM	You shouldn't adopt these regulations at all without some more evidence; however, mileage and vehicle condition are probably better (and more generally accepted) predictors of road worthiness than age alone.
54	Dec 5, 2011 2:56 PM	Mileage is an irrelevant number in motoring nowadays. vehicles that are well maintained, serviced and looked after can clock in excess of 300,000 miles. Some current PH in the town operate vehicles less than 3 years old that are not looked after and look worse than the older ones
55	Dec 5, 2011 2:00 PM	There should be no age limits
56	Dec 5, 2011 11:07 AM	The vehicles have to be 'immaculate' already. You can't get any better than that - immaculate means faultless.

Question 7

Do you think that Council testing for Hackney and Private Hire Vehicles should be increased from twice to three times per year if the Council Licensing Authority did not introduce an age limit?

Answer Options	Response Percent	Response Count
Yes	25.0%	41
No	70.7%	116
Don't know	4.3%	7
Comment		73
<i>answered question</i>		164
<i>skipped question</i>		1

Number	Response Date	Comment
1	Mar 2, 2012 3:42 PM	Don't know
2	Mar 2, 2012 3:30 PM	The decision should be based on evidence. If the existing tests are showing that a significant percentage are not up to standard, then yes, increase the frequency. Does Northampton Borough Council know or think that money grows on trees? please Northampton Borough Council twice a year is good enough and more to the point expensive enough. THINK!!! Times are hard enough. Is this council from another planet? Please help us not hinder. Thanks
3	Mar 2, 2012 2:57 PM	Bring in another test for older vehicles. Drop MOT part of licensing for vehicles that are not required to have MOT for 3 years.
4	Mar 2, 2012 2:51 PM	If they are I think the fees should be halved. Newer vehicles are easy to keep to the spec required.
5	Mar 2, 2012 2:45 PM	It should be once a year
6	Mar 2, 2012 2:41 PM	Twice is enough
7	Mar 2, 2012 2:38 PM	Twice is enough
8	Mar 2, 2012 12:41 PM	I think two times per year is plenty. The cost of each time is a lot and why should we pay for 2 MOT's when 1 lasts for 12 months..
9	Mar 2, 2012 12:20 PM	For older vehicles. 1. Plate for first, 3 years from new. 2. Plates for vehicles up to 8 years 3. Plates thereafter.
10	Mar 2, 2012 11:51 AM	In some of the towns and cities are still having test once a year. Twice a year is ok.
11	Mar 2, 2012 11:27 AM	It will be more costly and stressful for the driver and the earning isnt enough.
12	Mar 2, 2012 11:21 AM	Yes can do this after 5 years when public will have money to spend for hiring taxis/private hire vehicles. NOT IN THESE DAYS.
13	Mar 2, 2012 11:03 AM	Bot the price should be the same as we pay for a year one.
14	Mar 1, 2012 12:05 PM	Once a year is ample
15	Mar 1, 2012 11:33 AM	Because Northampton is only small town but some citys are only once a year even now we dont do the mileage as those in citys.
16	Mar 1, 2012 11:26 AM	But it is probably more use than the age limit being considered.
17	Mar 1, 2012 11:06 AM	6 months is a very short time. Other towns have one year e.g. Bedford. hackney owners pay a large amount of money to test vehicles and have new plates created and this affects many families and their incomes.

18	Mar 1, 2012 9:48 AM	The present testing is more than adequate
19	Mar 1, 2012 9:43 AM	The Government is considering extending the time between MOT's to 2years (as in germany) so why do you want to increase the number of tests.
20	Feb 29, 2012 12:28 PM	Half yearly testing is more appropriate
21	Feb 29, 2012 12:19 PM	If twice yearly platings have been ok all these years, why change it now. Its only more expense for the car owners.
22	Feb 29, 2012 12:09 PM	Unless you do not being in an age limit then my answer would be yes. You have to be sure the cab is always roadworthy.
23	Feb 29, 2012 12:23 AM	An incentive for operators to ensure their vehicles are in sound mechanical condition and a fair compromise if the other proposed concessions suggested above were to be adopted.
24	Feb 28, 2012 7:50 PM	Refer to Londons' requirements from 2012.
25	Feb 28, 2012 3:35 PM	Most definitely.
26	Feb 20, 2012 8:38 PM	Twice a year is more than adequate to ensure the high maintenance and safety of the vehicle.
27	Feb 20, 2012 3:40 PM	I think twice a year is good coz it cost a lot of money, to do it more than twice a year.
28	Feb 20, 2012 3:20 PM	Should be once time per year if twice per year then council licensing authority open more testing centre. MOT testing centres not friendly with drivers.
29	Feb 20, 2012 10:52 AM	But more frequent spot check and stop flagging
30	Feb 20, 2012 9:53 AM	I have said no because few could afford the increased cost
31	Feb 20, 2012 9:33 AM	It should of been one year in the first place, 2 times a year is more than enough for both types of vehicle
32	Feb 10, 2012 8:11 PM	This would just add more expense to the cost of operating a vehicle that the trade cannot afford.Operators who maintain their vehicles do so anyway,and it is up to the enforcement authorities to ensure that those who do not are removed from the trade.
33	Jan 19, 2012 4:01 PM	The regulations are fine as they are.
34	Jan 16, 2012 8:45 PM	Don't try to fix what isn't broken. But it could be increased to three times for older vehicles, other licensing authorities have introduced this system.
35	Jan 13, 2012 10:11 AM	This proposal to increase from twice to three times per year definitely will be rip off and nothing in connection with health and safety.
36	Jan 13, 2012 9:15 AM	For those taxis that are three or more older.
37	Jan 11, 2012 4:11 PM	It should do this REGARDLESS of the limits.
38	Jan 11, 2012 3:05 PM	You allready have 2 per year plus in present economic climate you are more likely to destroy the trade and put people out of work. Very intelligent that.
39	Jan 11, 2012 2:36 PM	Should be twice to three times per year depending on age
40	Jan 11, 2012 2:26 PM	Present time all kind of driver not make any money but cost are going up
41	Jan 11, 2012 6:46 AM	Current format is more than enough
42	Jan 10, 2012 11:04 AM	I think that a car that is of older age with more mileage should be looked at different. This is nby the MOT and council have a limit of 3 times a year! Should not apply to all vehicles.
43	Jan 10, 2012 10:53 AM	This is already a costly procedure which is stretching the trade to its limits. Other than the annual statutory requirements a lot of mney is spent on cosmetic whims that most customers do not even notice.

44	Jan 1, 2012 6:53 PM	I think the current Twice a year test is more than sufficient. In the areas where age limits have been introduced Daventry, Wellingborough they only test cars ONCE A YEAR.
45	Dec 20, 2011 11:02 AM	Because it depends how the maintenance of vehicle is
46	Dec 20, 2011 10:51 AM	That would equate to a period of every 4 months. The drivers would suspect a change would be effected purely on a financial advantage to the council
47	Dec 20, 2011 9:50 AM	Just do more spot checks visiting the multiple operatives premises as well as the spot checks procedure carried out at present.
48	Dec 20, 2011 9:27 AM	Its more hassle for us drivers to take the test. It is best to introduce an age limit. Stick with twice a year.
49	Dec 19, 2011 5:00 PM	Considering the amount of milage these vehicles do this seems reasonable.
50	Dec 19, 2011 3:53 PM	Only if you will pay for it.
51	Dec 19, 2011 3:36 PM	For cars over 6 years.
52	Dec 19, 2011 11:43 AM	It is expensive enough for two testing a year. You try and make a living as a taxi driver and see what a (b----) difficult it is.
53	Dec 15, 2011 10:48 AM	Its expensive enough as it is without adding an additional charge for what amounts to two months difference
54	Dec 15, 2011 10:32 AM	The industry cannot afford additional costs at this moment in time, unless the fee is waived.
55	Dec 15, 2011 10:19 AM	Seems a good compromise
56	Dec 14, 2011 12:12 PM	Two times a year is already too much considering the costs involved (i.e. plating, MOT etc
57	Dec 14, 2011 11:57 AM	I say no because its not affordable. It would be okay if the council paid for the test or extra tests. Maintenance costs would rise. fares would rise. Taxi economy, council revenue would take a hit. If an ordinary member of the public were asked this they'd say yes, but would they say yes if it meant a fares increase?
58	Dec 14, 2011 11:14 AM	It sounds like another money making scam for the council
59	Dec 14, 2011 10:49 AM	But the Three times I will like to be free of charge, because will get our expenses stay the same.
60	Dec 14, 2011 10:35 AM	Only if overall cost is the same in one year
61	Dec 14, 2011 10:19 AM	Twice a year is enough
62	Dec 14, 2011 10:12 AM	Police car and ambulances only twice a year. How can taxi be expected to be given harder life than these?
63	Dec 14, 2011 10:07 AM	But more authority for Borough examiners to refuse to test unsuitable vehicles
64	Dec 14, 2011 9:53 AM	Testing for purpose built taxis should be returned to a yearly test as mileage is less than private hire. P.H. should be tesated twice with an option of third test.
65	Dec 14, 2011 9:44 AM	There are a lot of issues in the industry that need addressing before you start taking more money from the drivers.
66	Dec 13, 2011 5:12 PM	twice a year is still a lot, will we gonna be fixing our cars 12 months a year
67	Dec 12, 2011 1:03 PM	This should be mandatory for testing to be carried out evey 3 months & a safety check carried out twice a year as well as regular servicing.
68	Dec 9, 2011 9:06 PM	Three times a year as this will improve standards.
69	Dec 8, 2011 2:04 PM	Keep existing system
70	Dec 7, 2011 10:21 AM	Absolutely. If there is no age limit, as these vehicles serve the public on a very regular basis, they should be tested even more frequently.

71	Dec 5, 2011 6:57 PM	I think this would be a better alternative to the proposed age limit
72	Dec 5, 2011 2:56 PM	Twice a year is more than enough provided the period in-between the tests is monitored and that enforcement is carried out and that any complaints made are followed up immediately. Any driver can call into the licensing officer and report an issue with a fellow drivers car but whether that is investigated is another matter! More regular spot checks, office visits etc. are a thing of the past it seems. It doesn't take long for any person to walk or drive around the Town to spot issues with many PH and Hackney vehicles but as this is rarely carried out, then the Council think the easiest option is not to monitor but to change policies that ensure their enforcement duties will become less by introducing this age limit.
73	Dec 5, 2011 11:07 AM	The decision should be based on evidence. If the existing tests are showing that a significant percentage are not up to standard, then yes, increase the frequency.

Question 8

Do you think the minimum engine capacity of Private Hire Vehicles should be increased from 1400cc to 1600cc?		
Answer Options	Response Percent	Response Count
Yes	48.8%	78
No	35.0%	56
Don't know	16.3%	26
Comment		61
<i>answered question</i>		160
<i>skipped question</i>		5

		No
1	Mar 2, 2012 3:42 PM	I can't see the argument for this. On economy and emissions grounds this would be a retrograde step. A modern 1.4 is perfectly capable of travelling at motorway speeds fully loaded. Taxis and minicabs don't need to be sportscars!
2	Mar 2, 2012 2:41 PM	Why?
3	Mar 2, 2012 2:38 PM	Why?
4	Mar 2, 2012 12:41 PM	I would think that depends on how the vehicle performs. I would think economy is more important than speed.
5	Mar 2, 2012 12:20 PM	No manufacturer of vehicles makes an underpowered vehicle. London is currently testing hydrogen taxis. These have a fuel cell system, they are 0cc. Engines in vehicles are far more powerful than in the past.
6	Mar 2, 2012 11:51 AM	Not only engine cc but the size of the body as well. Some of the private hire too small. A big built person struggle to get in and out.
7	Mar 2, 2012 11:21 AM	With engines power increase - all the positive specifications of vehicles increase - so this maybe a good idea for comfort of drivers/passengers.
8	Mar 1, 2012 12:05 PM	I'm not an expert, although perhaps a fully loaded car may struggle on a 1400cc engine, or some and not others.

9	Mar 1, 2012 11:26 AM	Specific output from engines have improved Many 1400cc engines would be more powerful than 1600cc engines.
10	Mar 1, 2012 11:06 AM	A car needs to have some power. A family size car is considered to be around 1600cc so it makes sense to do this and a larger size for comfort.
11	Mar 1, 2012 9:43 AM	Depends on power not engine size
12	Feb 29, 2012 12:28 PM	Smooth running and quick speed up.
13	Feb 29, 2012 12:19 PM	As I said before, including that that the engines are made so much better now, than they used to be. Smaller engines can quite easily manage higher mileages now. Bigger engines will use more fuel and cost more in road tax.
14	Feb 29, 2012 12:23 AM	Modern engines are more powerful than those of even a few years ago. A current one litre car has roughly the same horsepower as a 1.6 or 1.8 of ten years ago.
15	Feb 28, 2012 7:50 PM	Even for LPG/electric vehicles. Apart from emissions ther is more importantly the safety aspect when considering the acceleration capabilities when poptentially loaded with 5 persons on board.
16	Feb 20, 2012 8:38 PM	If the vehicle is carrying more than 5 people, the combined weight of those people could compromise the performance and safety of the passenger if the engine capacity is too low.
17	Feb 20, 2012 3:53 PM	Should be.
18	Feb 20, 2012 9:53 AM	This would exclude most Toyota Prius models which in my opinion the council should be encouraging the use of.
19	Feb 20, 2012 9:42 AM	I think a car with bigger engine is much smoother ride and comfort. A paying customer should expect that.
20	Feb 11, 2012 9:49 PM	I cannot see any justification for this. It is a generally accepted fact that larger capacity engines have higher emission levels. Enforcing larger capacity engines will increase emission levels.
21	Feb 10, 2012 8:11 PM	I have no experince of the private hire trade.
22	Jan 29, 2012 8:22 PM	Lower displacement engines are becoming more common with high power outputs and greater efficiency. Newer vehicles may mean this limit is too high.
23	Jan 23, 2012 12:16 PM	Not sure on the logic behind this as some new 1400CC engines have stop/start and low emissions and are able to transport passengers locally and on longer trips. For what purpose.?
24	Jan 19, 2012 4:01 PM	
25	Jan 16, 2012 10:43 PM	Who gains from this.? Probably yes as the proposal is for a 2 year phase in period to give owners of the smaller engine capacity vehicles reasonable time to purchase vehicles with larger engines.
26	Jan 16, 2012 8:45 PM	Engines are more efficient nowadays, what about hybrids?
27	Jan 13, 2012 10:11 AM	This is definitely right. The engine capacity is a key role. Higher engine capacity better quality more safe.
28	Jan 11, 2012 4:11 PM	1400cc with 4 in the vehicle is going to put extra strain on the engine
29	Jan 11, 2012 4:02 PM	1400cc is far too low for 4 passengers plus driver on a longish run.
30	Jan 11, 2012 3:05 PM	Doent take into account technology and Hybyrid and electric cars
31	Jan 11, 2012 2:36 PM	personally I've never driven less than 1.9 cc

32	Jan 10, 2012 11:04 AM	As long as it is roadworthy by the checks I don't see any problems.
33	Jan 1, 2012 6:53 PM	I think that the current engine limits are OK, how many of the current Private Hire Fleet are under 1600cc
34	Dec 20, 2011 9:50 AM	In this day and age the cost of running and maintaining a vehicle has to be a massive factor before buying a vehicle
35	Dec 19, 2011 5:00 PM	I cannot see what benefit this would bring, but have no information on which to form an informed opinion.
36	Dec 19, 2011 3:53 PM	The BHP and torque are what counts, not the cc.
37	Dec 19, 2011 3:36 PM	Should be on Horse power as this would not help hybrid owners like me.
38	Dec 18, 2011 3:29 PM	because of emissions... and keep the cost down for tax and insurance for the drivers.
39	Dec 15, 2011 11:00 AM	Many hybrids are less than 1600cc. Also emissions incurred with 1600cc
40	Dec 15, 2011 10:48 AM	There isnt really enough difference -200cc. Also shouldnt we be going more green i.e. less fuel burnt, lower emissions etc. car manufacturers should be producing smaller engines. Don't give excuse for larger ones.
41	Dec 15, 2011 10:32 AM	I thought part of introducing an age limit was to reduce emissions.
42	Dec 15, 2011 10:19 AM	Cannot understand the reasoning with modern vehicles
43	Dec 14, 2011 12:39 PM	With todays modern engine 1400cc is okay
44	Dec 14, 2011 12:12 PM	Depends on whether the vehicle can perform what it is meant for not about the engine capacity
45	Dec 14, 2011 11:57 AM	Not sure, will it mean more emissions?
46	Dec 14, 2011 11:14 AM	Small cars cant carry four bif lads/persons
47	Dec 14, 2011 10:19 AM	I see this has no impact as a taxi/private hire vehicles
48	Dec 14, 2011 9:53 AM	Derfinitely. I think 1600cc is too low.
49	Dec 14, 2011 9:44 AM	Maybe even higher, 1900cc
50	Dec 13, 2011 5:12 PM	dont have problem with that
51	Dec 13, 2011 2:00 PM	WHAT WOULD THIS HELP ???
52	Dec 12, 2011 1:03 PM	In this day & age & the need to cut C.O.2 emmissions, we all need to be aware of MPG. So a more efficient vehicle may be over the 1600 cc & may be a 2.0 ltr TDi
53	Dec 9, 2011 9:06 PM	I think emmissions should be considered and not engine size.
54	Dec 9, 2011 4:24 PM	more safety for passengers It should all be based on horsepower.
55	Dec 7, 2011 10:21 AM	As today a 1600 may produce certain emmissions but a newer car may be introduced where a 1300 gives the same output and service as a 1600 and the whole policy will have to be rewritten
56	Dec 6, 2011 7:42 PM	No will increase carbon emmissions
57	Dec 6, 2011 9:40 AM	200cc ! - Get real, this will make no difference in a modern engine.
58	Dec 5, 2011 5:13 PM	I don't really follow the argument for this. 1400cc engines generally do not equate to vehicles that provide adequate size and comfort nor do they actually make a positive contribution to less 'greenhouse gas' but in many instances they make a negative contribution by virtue of having to work harder and at greater engine revolutions emmitting even more pollutants.
59	Dec 5, 2011 4:59 PM	
60	Dec 5, 2011 2:00 PM	Engine capacity does not denote power of engine

61 Dec 5, 2011 11:07 AM

I can't see the argument for this. On economy and emissions grounds this would be a retrograde step. A modern 1.4 is perfectly capable of travelling at motorway speeds fully loaded. Taxis and minicabs don't need to be sportscars!

Question 9

Do you think that Hackney Carriages and Private Hire Vehicles that are adapted to carry wheelchairs should be exempt from age/engine capacity restrictions?		
Answer Options	Response Percent	Response Count
Yes	35.4%	58
No	45.1%	74
Don't know	19.5%	32
Comment		53
<i>answered question</i>		164
<i>skipped question</i>		1

Number	Response Date	Comment
1	Mar 2, 2012 3:42 PM	Yes
2	Mar 2, 2012 2:45 PM	If it improves access opportunities. I'd expect these to be the bigger vehicles with larger engines anyway
3	Mar 2, 2012 2:41 PM	Not at all. Age must be adopted for the wheelchairs as they carry the disability.
4	Mar 2, 2012 2:38 PM	Why?
5	Mar 2, 2012 12:41 PM	Why?
6	Mar 2, 2012 12:20 PM	All hackneys are able to carry wheelchairs. Not sure about Private Hire vehicles. Small minibuses are stronger than saloon cars and last longer.
7	Mar 2, 2012 11:21 AM	No vehicle is exempt from age related problems. Do people in wheelchairs not count as much as anybody else?
8	Mar 1, 2012 11:26 AM	Because of the amount of money invested in these vehicles
9	Mar 1, 2012 11:06 AM	Probably not. This could be seen as implying that wheelchair users can accept different standards to everyone else.
10	Mar 1, 2012 9:43 AM	As your aim is to improve disabled use this will enable more cars to remain. The TX models have ramps and therefore should be considered for this.
11	Feb 29, 2012 12:28 PM	It costs a lot to convert a vehicle so it will put prices up
12	Feb 29, 2012 12:19 PM	All motor vehicles have the similar vehicle emissions.
13	Feb 29, 2012 12:09 PM	Depending servicing, maintenance and age Owners will struggle to keep replacing them and there would be a shortage of these type of vehicles to cater for the disabled.
14	Feb 20, 2012 8:38 PM	The whole point is safety. This would imply that they could avoid changing cabs.
15	Feb 20, 2012 3:40 PM	Common sense should prevail here. Provided the vehicle is well maintained and is equipped to accommodate wheelchairs (i.e. restraining straps fitted/engaged adequately) then engine age and capacity restrictions are irrelevant.
16	Feb 20, 2012 9:53 AM	I think it should be a uniform for everyone
		There must be rules to include everyone not just a few

- 17 Feb 20, 2012 9:42 AM I'm not too sure about engine capacity but they should not be exempt from age restrictions. The newer the car better for wheelchair users. Newer cars have better access.
- 18 Feb 10, 2012 8:11 PM Since all hackney vehicles are able to carry wheelchairs I would support this.
- 19 Jan 29, 2012 8:22 PM Particularly for converted vehicles already in the fleet.
- 20 Jan 19, 2012 4:01 PM Age and/or capacity is totally irrelevant.
- 21 Jan 16, 2012 10:43 PM Owners of these vehicles should probably be encouraged to comply with the age/engine capacity restrictions although consideration would need to be made for the higher cost of replacement vehicles.
- 22 Jan 16, 2012 8:45 PM Again this could be open to abuse.
- 23 Jan 11, 2012 4:11 PM Definately not. Disabled people deserves the same safety regime as able bodied people.
- 24 Jan 11, 2012 4:02 PM But only as far as section six applies
- 25 Jan 11, 2012 3:05 PM As stated before vehicle condition is paramount
- 26 Jan 11, 2012 2:36 PM You could argue that one backwards and forwards. Good one for future discussion on committee. I would rely on officers decision.
- 27 Jan 10, 2012 10:53 AM They still clock up similar mileages and ir anything should carry more stringent conditions
- 28 Dec 20, 2011 11:02 AM Because these vehicles were built for the disable ones
- 29 Dec 20, 2011 10:51 AM At the end of the day they are 'Hire' vehicles regardless of wheelchair capability and should conform just like everyone else.
- 30 Dec 19, 2011 5:00 PM Unless there is a need for some mechanical lift system or other machinery that would assist people in getting in or out of the vehicle. Otherwise I do not see that a larger engine would be needed to offset for any additional weight.
- 31 Dec 19, 2011 3:53 PM lets have a level playing field just like our european masters say we should have.
- 32 Dec 19, 2011 3:36 PM These vehicles only pay £1500 for the lift and it can be moved to their next vehicle easily.
- 33 Dec 18, 2011 3:29 PM i'm not sure again depends on the vehicle condition and an official to confirm and the vehicle to be checked on a regular occasion
- 34 Dec 15, 2011 10:48 AM Of course. The cost of converting these vehicles from standard is very high and would make replacement for a new vehicle unsustainable. They tend to travel fewer miles too.
- 35 Dec 15, 2011 10:32 AM Rules should apply to all relevant sectors within the industry
- 36 Dec 14, 2011 12:39 PM they do same job as any other taxi
- 37 Dec 14, 2011 11:57 AM Should perhaps be given a larger limit as great expense is incurred in the adaptation of vehicles
- 38 Dec 14, 2011 11:14 AM Wheelchair doesnt make any difference if cc over 1600cc
- 39 Dec 14, 2011 10:29 AM there should be no exemptions
- 40 Dec 14, 2011 10:07 AM Why?
- 41 Dec 14, 2011 9:53 AM Purpose built taxis yes, saloon or MPV no
- 42 Dec 14, 2011 9:44 AM There should be a level playing field.
- 43 Dec 12, 2011 1:03 PM I currently drive for NCC as a Qualified Midas Bus Driver, fully Enhanced CRB checked & work with the Disabled on a daily basis.
- 44 Dec 9, 2011 9:06 PM We have a large amount of Private Hire & Hackney vehicle that are both for abled & disabled persons, so they are obtaining the same amount of work, so must stick to the same rules.
Balanced views... It costs more to adapt the car, but then why show disabled people have to settle for older cars.... No real thought, but we must have enough cars to cater for all.
- 45 Dec 9, 2011 4:24 PM How many are involved??? if only a small % a we could loss some of them with the new rules then NO

46	Dec 7, 2011 10:21 AM	However, they should still be subject to the same rigorous testing for safety. They should be even safer than the normal vehicle
47	Dec 6, 2011 7:42 PM	see 8 above
48	Dec 6, 2011 9:40 AM	Of course these vehicles should have the same regulations, are you suggesting wheelchair users should have a reduced level of safety (and not have their extra 200cc of comfort)?
49	Dec 5, 2011 5:13 PM	I think all vehicles should be under the same age limit. I am sure wheelchair users are just as interested in their safety as non-wheelchair users.
50	Dec 5, 2011 4:59 PM	But only under very strict limits and also only if a thrice a year inspection is adopted.
51	Dec 5, 2011 2:56 PM	They are normally more abused than any other vehicle due to the nature of business
52	Dec 5, 2011 2:00 PM	There should be no age limits
53	Dec 5, 2011 11:07 AM	If it improves access opportunities. I'd expect these to be the bigger vehicles with larger engines anyway.

Question 10

If the minimum engine capacity of Private Hire Vehicles is increased from 1400cc to 1600cc, should Northampton Borough Council Licensing Authority have exemptions (e.g. for hybrids, which are generally 1500cc)?

Answer Options	Response Percent	Response Count
Yes	50.6%	82
No	25.9%	42
Don't know	23.5%	38
Comment		44
<i>answered question</i>		162
<i>skipped question</i>		3

Number	Response Date	Comment
		Yes
1	Mar 2, 2012 3:42 PM	Exemptions for any vehicle that can demonstrate that it doesn't do whatever it is that you don't like about 1400s
2	Mar 2, 2012 12:41 PM	I cannot comment on this as I dont fully understand hybrids.
3	Mar 2, 2012 12:20 PM	No manufacturer of motor vehicles makes a vehicle that is underpowered
4	Mar 2, 2012 11:51 AM	Dont listen to company owners. Listen to public. Public safety and comfort is more important than size and age of a vehicle.
5	Mar 2, 2012 11:21 AM	Either increase it or leave it as it is to keep the trade business as simple as possible. Too much regulations just makes things complicated
6	Mar 2, 2012 11:03 AM	If you know why you are increasing from 1400cc to 1600cc then you should not be asking this.
7	Mar 1, 2012 12:05 PM	Same as Q8
8	Mar 1, 2012 11:26 AM	As for Q8 engine capacity is not necessarily relevant.
9	Mar 1, 2012 11:06 AM	As long as the hybrids are of family size that carries 4 passengers. The smaller hybrids will not be useful.
10	Feb 29, 2012 12:23 AM	Although it is hoped this is one consultation where the council will actually listen to and adopt the public's responses, so an exemption for hybrids would not prove necessary.
11	Feb 28, 2012 7:50 PM	See comment 8 above.

12	Feb 20, 2012 8:38 PM	Provided hybrids meet all Council's hackney/private hire requirements, then there is no reason for exemptions.
13	Feb 20, 2012 10:11 AM	The minimum size does not need to be raised in the first place.
14	Feb 20, 2012 9:53 AM	Hybrids should be encouraged I cannot see any justification for increasing the minimum engine capacity. It is a generally accepted fact that larger capacity engines have higher emission levels. Enforcing larger capacity engines will increase emission levels. Use of hybrid engine technology should be encouraged.
15	Feb 11, 2012 9:49 PM	Hybrid technology is still developing and should not be limited by traditional capacity measurements.
16	Jan 29, 2012 8:22 PM	Hybrid or alternative fuel vehicles should be exempted from all engine capacity considerations to encourage uptake.
17	Jan 19, 2012 4:01 PMbut why increase it anyway..?
18	Jan 16, 2012 8:45 PM	For environmental reasons these vehicles should be allowed provided they meet the rest of the Council's specifications.
19	Jan 11, 2012 4:11 PM	Keep it simple. 1600cc minimum. If manufacturers see a gap in the market i'm sure they will develop 1600+ hybrid versions.
20	Jan 11, 2012 4:02 PM	I have a Hybrid which the Manufacturers have now upgraded to 1800cc because they did-not consider it powerful enough at 1500cc, this must apply more-so to a vehicle that is likely to be driven more than a private vehicle.
21	Jan 11, 2012 3:05 PM	What a stupid question. You had no need to put question 8 in. Answered already You're digging yourself into a hole.
22	Jan 11, 2012 2:36 PM	Hybrids should have their own guidelines.
23	Jan 10, 2012 10:53 AM	Depends on brake horse power If thje council says 1600cc, this should be the minimum requirements then that should be a formative condition when the vehicle is chosen/purchased
24	Dec 20, 2011 10:51 AM	I approve of any move to encourage hybrids or electric vehicles.
25	Dec 19, 2011 5:00 PM	Hybrids have 1.5 and 1.4 petrol with electric motor = 130 brake horse power, the same as a 1.9 diesel in power output.
26	Dec 19, 2011 3:36 PM	see q8 answer
27	Dec 15, 2011 11:00 AM	Just think tyou are opening a new can of worms. What about totally electric vehicles? You shopuld be encouraging alternative methods. Why not let it find its own level? who in their right mind would run an 850cc or a 6 litre vehicle for general purpose work
28	Dec 15, 2011 10:48 AM	see q8
29	Dec 14, 2011 12:39 PM	This is supposedly a drive to reduce emissions so obviously yes. If the council genuinely wished to reduce emissions then restricted users/no left/right turning (example marefair and castle station) would be open. these restrictions cause congestion in other areas and cause unnecessarily longer journeys hence more expense for customer.
30	Dec 14, 2011 11:57 AM	They are environmentalall friendly cars. Good for environment.
31	Dec 14, 2011 11:14 AM	Please no exemptions at all, which means no loopholes and everybody would be clear of one ruling only. Be brave and take this chance to make one rule for all. No exemptions means no confusion.
32	Dec 14, 2011 10:29 AM	Output same as 2,200 diesel so must be good
33	Dec 14, 2011 10:12 AM	Why make lidfe difficult. keep to one rule.
34	Dec 14, 2011 9:53 AM	CAN'T SEE WHY ENGINE CAPACITY SHOULD BE INCREASED
35	Dec 13, 2011 2:00 PM	The council makes the rules & regulations, so Private Hire persons or companies to comply with these rules & regulation.
36	Dec 12, 2011 1:03 PM	Emmissions should be the main consideration.
37	Dec 9, 2011 9:06 PM	we must support any green policies
38	Dec 9, 2011 4:24 PM	

39	Dec 7, 2011 10:21 AM	Again, they should consider horsepower rather than engine size
40	Dec 6, 2011 11:38 AM	Yes the hybrids are environmentally friendly.
41	Dec 6, 2011 9:40 AM	While the whole proposal is pretty ill thought out, inadvertently banning hybrids would be crazy.
42	Dec 5, 2011 5:13 PM	Environmentally friendly cars are to be encouraged.
43	Dec 5, 2011 4:59 PM	And encourage investigation into the use of electric vehicles.
44	Dec 5, 2011 11:07 AM	Exemptions for any vehicle that can demonstrate that it doesn't do whatever it is that you don't like about 1400s.

Question 11

At present all vehicles, irrespective of age, have to have an MOT certificate and a council test to receive a plate and are then re-tested by the Council again after 6 months. Should all brand new vehicles be exempt from a council re-test until 12 months from first DVLA registration?

Answer Options	Response Percent	Response Count
Yes	57.9%	95
No	31.7%	52
Don't know	10.4%	17
Comment		49
<i>answered question</i>		164
<i>skipped question</i>		1

		Don't know
1	Mar 2, 2012 3:42 PM	Depends on the evidence - is this a problem? Don't try to solve problems that don't exist
2	Mar 2, 2012 2:57 PM	For the 3 years no MOT but council test only.
3	Mar 2, 2012 12:41 PM	I think it is good for a new vehicle to be tested. As I have experienced new vehicles having loose parts on steering.
4	Mar 2, 2012 11:27 AM	yes because they will be brand new and it will be less stressful for the driver.
5	Mar 2, 2012 11:21 AM	Because sometimes brand new vehicles can have things doing required for private Hire purposes e.g. having meter, fire extinguisher etc fixed.
6	Mar 1, 2012 12:05 PM	See Q7
7	Mar 1, 2012 11:26 AM	Light bulbs could fail at anytime. Tyres could be U/S due to damage or wear. So some type of inspection is required but a responsible driver should do that anyway.
8	Mar 1, 2012 11:06 AM	when a new car is bought it is exempt from MOT for 3 years so a year sounds reasonable as it is a brand new vehicle. However council should do an inspection after 5 months and if requires it then an MOT.
9	Mar 1, 2012 9:43 AM	Why waste other peoples money.
10	Feb 29, 2012 12:28 PM	As its under manufacturers warranty
11	Feb 28, 2012 7:50 PM	It is not unknown for both new HC's and PHV's to fail the first Council plating test. The safety of the public is paramount.
12	Feb 21, 2012 1:20 PM	And once a year for the first three years
13	Feb 20, 2012 8:38 PM	If a vehicle is brand new, then there is no need for 2 tests to be carried out in its first year. A normal private vehicle is exempt from an MOT test for 3 years.
14	Feb 20, 2012 3:40 PM	I think they should be exempted for up to 3 years

15	Feb 20, 2012 9:53 AM	A new vehicle can develop faults just as much as any other aged vehicle
16	Feb 11, 2012 9:49 PM	It's surprising the number of new vehicles which fail their first MOT.
17	Feb 10, 2012 8:11 PM	A badly maintained vehicle can deteriorate to a very bad state from new in 12 months.
18	Jan 23, 2012 12:16 PM	No. Due to the wear and tear of these vehicles they should be tested sooner than other cars.
19	Jan 19, 2012 4:01 PM	Having to take a brand new vehicle, straight from the showroom, to have an MoT test, is quite frankly, ABSURD..!!
20	Jan 16, 2012 8:45 PM	New vehicles can have faults, be they minor or major they should still be inspected.
21	Jan 11, 2012 4:11 PM	We all see brand new cars less than a year old with bulbs out and poorly aligned headlights. The MOT and council tests will ensure they are fit to carry the public.
22	Jan 11, 2012 3:05 PM	.I've known situations in the past where new cars failed their test.
23	Jan 11, 2012 2:36 PM	Whether the first inspection is necessary is debatable. Certainly not the second.
24	Jan 10, 2012 11:04 AM	I think up to a vehicles that is X.Y reg and below depending on the mileage should be down to the MOT testing and council to check condition of car!
25	Jan 10, 2012 10:53 AM	In 12 months, a fleet "new car" could have mileage of 80000/100000.
26	Dec 20, 2011 11:02 AM	Always be tested if the vehicle is in public use
27	Dec 20, 2011 10:39 AM	London Taxis has vehicles (Hackneys) new and up to 6 years is 1 test per year and two after.
28	Dec 20, 2011 9:50 AM	When you buy a new vehicle you would hope it was roadworthy for the first year.
29	Dec 19, 2011 5:00 PM	Only if this could be used as an incentive to encourage more drivers to use new or near-new vehicles.
30	Dec 19, 2011 3:53 PM	A new vehicle could be a wreck after 12 months
31	Dec 19, 2011 3:36 PM	Then once a year for the first three years to make people buy new cars.
32	Dec 18, 2011 3:29 PM	the reason i say no is because regardless of the vehicle they all do roughly the same mileage and all need checking as it is the public who are in danger if anything happens
33	Dec 14, 2011 12:39 PM	Due to the excess mileage they could possibly do
34	Dec 14, 2011 12:12 PM	Usually new cars are exempted for three years before they can have their first MOT and the council should consider this as well.
35	Dec 14, 2011 11:57 AM	But a taxi could cover up to 60,000 miles p/a if running day and night. Again perhaps mileage is a more appropriate measure.
36	Dec 14, 2011 11:14 AM	Again if a car is new it doesn't mean it's safe
37	Dec 14, 2011 10:29 AM	Having just spent £28,000 on a new vehicle I think 12 months is fair. I would also be a good idea to force private hire vehicles to have their plates fixed to the exterior rear of vehicles as do Hackney vehicles. Please enforce this.
38	Dec 14, 2011 10:19 AM	Because a new vehicle can do a lot of miles within 6 months, therefore tyres and brakes mainly need checking
39	Dec 14, 2011 10:12 AM	fault on car can incur after one day new or old. So leaving garage why can brand new car not have problem.
40	Dec 14, 2011 10:07 AM	In 6 months some vehicles are capable of doing 30 - 35000 miles in that time
41	Dec 14, 2011 9:53 AM	Also, purpose built taxis should only be tested annually.

42	Dec 13, 2011 5:12 PM	in that case brand new vehicles should be exempted for three years
43	Dec 12, 2011 1:03 PM	An MOT does not prove that the vehicle is in a roadworthy condition, it is a test that only tests certian things for complience.
44	Dec 9, 2011 9:06 PM	This will encoourage people to buy new... And the standard of newer cars is generally better.
45	Dec 7, 2011 10:21 AM	A vehicle can be damaged within minutes of leaving a show room. They should all be tested equally. however i understand this will not be incentive then to buy new cars
46	Dec 6, 2011 7:42 PM	Depends on mileage driven Perhaps that should always be the determinant for testing
47	Dec 5, 2011 2:56 PM	Even brand new vehicles have been known to have factory faults so all vehicles need testing.
48	Dec 5, 2011 2:00 PM	Acts as incentive to get new vehicle
49	Dec 5, 2011 11:07 AM	Depends on the evidence - is this a problem? Don't try to solve problems that don't exist.

Question 12

Can you suggest any other ways in which Northampton Borough Council Licensing Authority could help improve public safety, reliability and comfort for passengers?

Answer Options	Response Count
	108
<i>answered question</i>	108
<i>skipped question</i>	57

Number	Response Date	Response Text
1	Mar 2, 2012 3:42 PM	No, other than listen to what customers and the drivers themselves say about what could be improved
2	Mar 2, 2012 3:30 PM	I have so much to say this space is not enough. I will write another letter of suggestion.
3	Mar 2, 2012 2:57 PM	By regular checking of vehicles that are plated and do not announce that you are doing it.
4	Mar 2, 2012 2:45 PM	I think the safety checks be increased and random checks in place.
5	Mar 2, 2012 2:41 PM	Give Private Hire somewhere in the Town they can park without being hounded by wardens all the time.
6	Mar 2, 2012 2:38 PM	Give Private Hire somewhere in the Town they can park without being hounded by wardens all the time.
7	Mar 2, 2012 12:41 PM	No. The comfort depends on how the vehicle is kept clean and safe driving and seatbelts working properly is important.
8	Mar 2, 2012 11:51 AM	Please keep an eye on drunk drivers. They are playing with innocent public life.
9	Mar 2, 2012 11:35 AM	To introduce saloon cars as hackney carriages because they are more reliable, safe and comfortable.
10	Mar 2, 2012 11:21 AM	Need to ask questions seperately for Hackeney and Private Hire vehicles. Then better suggestions can be made. CONSIDER THIS.
11	Mar 2, 2012 11:03 AM	Extra comfot and safety comes with an extra charge.
12	Mar 1, 2012 12:05 PM	More frequent on the spot checks from licensing officers
13	Mar 1, 2012 11:33 AM	Make town centre emission free zone.

14	Mar 1, 2012 11:26 AM	Insist on exemplary standards of driving and presentation of the vehicle.
	Mar 1, 2012 11:06 AM	Have more council patrols at ranks to see the cleanliness of vehicles - drivers should keep the inside and out clean for customers.
15		Set up a course for drivers - Dealing with Customers, hospitality? CCTV camera in vehicles Dresscode for drivers.
16	Mar 1, 2012 10:17 AM	To putting more safety features in the cabs such as air bags and to increase road stability etc.
17	Mar 1, 2012 10:05 AM	To introduce saloon cars in hackney because they are more comfortable, more stable on the road. Got air bags in front and rear got lot more.
18	Mar 1, 2012 9:48 AM	All is being done
19	Mar 1, 2012 9:33 AM	To improve LTI quality. You can get a brilliant make of vehicle for that much money with more stable on road and more safe. Ok you should introduce saloon cars as Hackneys.
20	Feb 29, 2012 12:28 PM	More training, seminar etc
21	Feb 29, 2012 12:09 PM	Improve professional efficiency have all your drivers passed a UK driving test and how stringent is the checking of those passed to ensure they have taken the test and not someone on their behalf.
22	Feb 29, 2012 12:23 AM	It could require all drivers holding a private hire licence to take advanced driver training and to take their Institute of Advanced Motorists (IAM) or Royal Society for the Prevention of Accidents (RoSPA) test within two years of first issue of their licence.
	Feb 28, 2012 7:50 PM	Closer control of PH operators especially those with large fleets or multiple operator licences. They are prepared to continually charge weekly radio rents knowing that there is insufficient work for the drivers who then have to resort to flagging to make a living. If there are a number of drivers fined for flagging the operator should also be fined. If, after a pre-defined number of fines their licence should be permanently revoked as an unsafe operator. More ad-hoc inspections of unsafe vehicles with higher penalties for drivers.
23		Implement ad-hoc inspections for clean vehicles, the drivers receiving a three warning system before token fines being implemented. More 'sting' operations especially at night/ early morning and at peak times i.e. Friday/Saturday & bank holidays. This has to be a large scale operation and almost instantaneous as for many years the HC's and a vast number of PHV's disappear as soon as the Licensing/police/immigration/ social services make their first move in town. Mobile phones and radios spread warning very quickly. Clamp down on the drivers who continue to smoke in their vehicles. There are still a considerable number who do. Implement a random breath test for drivers in the mornings. There are quite a number who drink excessively some nights.
24	Feb 28, 2012 3:35 PM	Drivers should be tested (As London cabbies) and have a tachograph
25	Feb 28, 2012 3:25 PM	More checks on condition and driving standards
26	Feb 28, 2012 3:23 PM	Maybe more checks
27	Feb 28, 2012 3:21 PM	I have no idea
28	Feb 20, 2012 8:38 PM	Training should be compulsory to teach drivers how to load and unload wheelchairs and deal with disabled passengers.
29	Feb 20, 2012 3:40 PM	Just to continue to have ransom checks if they are roadworthy, like what VOSA and the police do, at least once per month.

30	Feb 20, 2012 3:29 PM	Many Hackneys are too old to be on the road. Also they are not disabled accessible. hackneys should not be on the road after 5 years.
31	Feb 20, 2012 3:23 PM	Tighten who can drive. Too many thugs and drug dealers driving cabs in the Town. Ban anyone who has been to prison.
32	Feb 20, 2012 10:52 AM	More spot checks as frequent as possible
33	Feb 20, 2012 10:11 AM	More spot checks
34	Feb 20, 2012 10:06 AM	yes, no smoking means no smoking. The council have given up checking drivers. Should have lived in N'ton 5 years before they get their badge.
35	Feb 20, 2012 9:53 AM	More spot checks, more stringent 1st badge.
36	Feb 20, 2012 9:42 AM	Yes. Stop flagging, when this happens the driver is rushing and speeding to drop off the flagging customer to get to the booking customer. Then accidents happen and is late for booking.
37	Feb 20, 2012 9:33 AM	Stop Hackney carriages flagging in a queue anywhere. Also private Hire should not be allowed to flag
38	Feb 16, 2012 5:21 PM	By having an upper age limit for Private Hire Vehicles of 5 years, except for specific purposes, where a 'classic' car may be requested for a wedding, etc.
39	Feb 11, 2012 9:49 PM	I'm not aware of any consideration being given to the assessment of drivers, for example frequent eye sight checks, recognised advanced driver training qualification (and ongoing re-assessment).
40	Feb 10, 2012 8:11 PM	Ensure that drivers and operators who do not measure up to the required standards are removed from the trade as they give everyone a bad name.Allow hackney carriages to use ALL bus lanes.
41	Feb 10, 2012 6:50 PM	weed out bad operators.
42	Jan 29, 2012 8:22 PM	Taxis to have vehicle number displayed on the side of the vehicle to aid identification
43	Jan 23, 2012 12:16 PM	Each taxi should have a mini camera installed to record the whole journey in a taxi, this protects the driver and customer.
44	Jan 20, 2012 6:43 PM	drivers should be able to speak good english and know where to go which many don't
45	Jan 20, 2012 11:56 AM	COLOUR CODE THE VEHICLES AS IN OTHER TOWNS/CITIES/COUNTRIES. HIRE VEHICLES SHOULD BE INSTANTLY RECOGNISABLE FOR WHAT THEY ARE , HACKNEY CARRIAGE (SAY BLACK) PRIVATE HIRE (SAY YELLOW) COLOUR CODING ADDS STATUS TO THE TOWN AND ENSURES SAFETY AND SECURITY FOR PASSENGERS.
46	Jan 19, 2012 4:01 PM	Current criteria are fine as they are. A company stands or falls by it's service. Quite simply, if a driver turns up in a scruffy looking vehicle, full of rust holes, and stinking of cigarette smoke, the passenger will not use that company again. It is in the companys' best interests to have only clean and tidy cars.
47	Jan 16, 2012 10:43 PM	Working with owners/operators of Hackney Carriage and Private Hire vehicles to promote a high standard of vehicle maintenance and presentation. Its very disappointing to reports of vehicles found in spot checks to have faults such as defective lights and tyres.
48	Jan 16, 2012 8:45 PM	Yes increased spot checks and proper policing of the trade, this includes flagging by legal and illegal drivers at peak times not just on the occaisional night when the licensing officers feel like it.
49	Jan 13, 2012 10:11 AM	NBC should spend more money on road maintenance.

50	Jan 13, 2012 9:23 AM	I think you are doing the best
51	Jan 13, 2012 9:18 AM	After 12 hours a driver should have 3 hours rest
52	Jan 13, 2012 9:15 AM	Cuirrent standard of mot/stop check is good enough for passengers satisfaction.
53	Jan 11, 2012 4:11 PM	Ensure they can speak English. There is a massive proportion of foriegn drivers and some just cant communicate.....
54	Jan 11, 2012 4:02 PM	Have a drees standard, some drivers are absolute tramps and do-not give confidence to passengers.
55	Jan 11, 2012 3:05 PM	By dealing with flagging more regularly. Concessions are being given to Hackney Cabs i.e. drapery taxi rank and treating private hire as second class citizens because of flaggers.
	Jan 11, 2012 2:49 PM	Quality of service isnt only based on new reg of the car: Efficiency of drivein
56		Knowledge and commnication skills Good training and operation of drivers Customer service
57	Jan 11, 2012 2:36 PM	Spot checks and enforcement top stop flagging would get rid of rogue drivers
	Jan 11, 2012 6:46 AM	Introduce NVQ qualification as standard requirement for all drivers,this would make drivers aware of their safety responsibilities towards the paying public.Put an end to the constant "flagging" that occurs in Gold St and the Horsemarket as vehicles are causing disruption to other sensible road users, who have no interest in breaking the law, by their inconsiderate parking.
58		
59	Jan 10, 2012 11:04 AM	Where it does not affect everyone who have vehicles that are over 2001 reg onwards. If need be those cars need to be tested 3 times a year.
60	Jan 10, 2012 10:58 AM	Stop giving out so many badges so that drivers can earn money to maintain their cars
61	Jan 10, 2012 10:53 AM	By ensuring all drivers have an adequate level of oral and written english language and a competent skill in driving!
62	Jan 1, 2012 6:53 PM	There should be more stringent tests on driving standards
63	Dec 23, 2011 9:00 PM	concentrate more on the quality of the drivers and the companies.
64	Dec 20, 2011 11:02 AM	More spot checks either days or nights
65	Dec 20, 2011 10:57 AM	Stop Hackney and Private Hire vehicles parking in town centre flagging. Get Borough Officers off the office chairs into town and enforce regs. Stop drivers smoking and using mobiles while working
66	Dec 20, 2011 10:39 AM	Minimise the illegal flagging by private Hire at night more.
67	Dec 20, 2011 9:50 AM	Only speaking about the Hackney trade have never known that public safety or comfort has ever been compromised by the trade as it has adhered to as the councils parameters and conditions, other than perhaps some of the drivers.
68	Dec 20, 2011 9:27 AM	none
69	Dec 20, 2011 9:12 AM	I think as long as a car has been looked after properly it doesnt matter what age it should be fine on the road.
	Dec 20, 2011 8:59 AM	NBC Licensing could improve by carrying out more stings on flagging rather than the odd clamp down. Unclean cars should also be taken off the road until they are fit to carry passengers. Private Hire drivers are also affected by flagging so that should be considered rather than ignored.
70		

71	Dec 19, 2011 5:00 PM	More spot checks and surprise testing with tougher penalties. It is unacceptable that so many vehicles fail these spot checks. Clearly indicative of a problem with the testing system.
72	Dec 19, 2011 3:53 PM	Perhaps an approved list of testers for their non-MOT? Or maybe this could be brought in-house to the police or council? Remove illuminated roof signs which encourage flagging and entice drunken pedestrians to step out into the road in an attempt to flag you down.
73	Dec 19, 2011 3:36 PM	As above then after 6 years, 3 plates per year this better to have. New cars make people Think New.
74	Dec 19, 2011 3:23 PM	Ensure all drivers speak good english, have studied the highway code, can understand it and abide by it. Check drivers ability regularly.
75	Dec 19, 2011 11:43 AM	the council should do more spot checks and catch those flaggers and unlicensed taxis
76	Dec 18, 2011 3:29 PM	making sure that the driver has I.D. shown in his car and the interior is in good condition as well as the exterior... English speaking drivers would be preferred not just by me but friends, family and colleagues... a seatbelt sign advising passengers to always seat belts and drivers to reinforce that... maybe a booster seat available as when travelling with children these are required by law and parents can not carry them around with them when shopping in town with children.
77	Dec 15, 2011 11:00 AM	Possibly spot checks however costs are high in policing this.
78	Dec 15, 2011 10:54 AM	No
79	Dec 15, 2011 10:32 AM	No....I think that twice yearly test is sufficient, at the end of the day if there were to be a legal case it would be the operator not the council that would be charged so maybe issue all operators with their maintenance expectations
80	Dec 15, 2011 10:19 AM	Concentrate on the quality of driver.
81	Dec 14, 2011 12:39 PM	More spot checks
82	Dec 14, 2011 12:12 PM	I think the purpose of the MOT every 6 months is to ensure the vehicles are safe. The inspection done at the MOT are more than enough.
83	Dec 14, 2011 11:57 AM	Limit the total amount of private hire vehicles and hackneys so that drivers earn a decent living. Then they have no excuse about affordability of new cars and maintenance.
84	Dec 14, 2011 11:14 AM	Enhanced CRB, Proper communication, health issue for all drivers
85	Dec 14, 2011 10:49 AM	If any change is need to done, I think the old cars like 10 years old need to be tested sooner than 6 months because one of three years old is not need to be the same test for old and young cars.
86	Dec 14, 2011 10:35 AM	More spot checks for Hackney/Private Hire vehicles. patrols on Wellingborough Road to reduce amount of flagging on Fri/Sat nights and more public awareness of difference between hackney and Private Hire
87	Dec 14, 2011 10:29 AM	Bring in 10 year rule and 1600cc with no exemptions which would allow a fairly modern fleet of vehicles with latest safety technology which I feel would without a doubt be good for the fare paying public
88	Dec 14, 2011 10:19 AM	Some of the smaller vehicles like Fabia's, roomsters etc have very limited leg room and doors not opening wide enough to allow easy access in-out of the vehicle.
89	Dec 14, 2011 10:07 AM	Some sort of minimum leg room in the rear seat area. Some vehicles are too short inside. No leg room.
90	Dec 14, 2011 9:53 AM	More stringent policing of vehicles

91	Dec 14, 2011 9:44 AM	There should be much stricter enforcement of the current rules, especially in relation to flagging.
92	Dec 13, 2011 5:12 PM	IMPROVE THE SAFETY OF PRIVATE HIRE DRIVERS FROM GETTING STABBED, FROM RUNNERS AND FOR GETTING ROBBED, PUBLIC SAFETY IS ENOUGH ALREADY
93	Dec 13, 2011 4:20 PM	Stop unlicensed cars being used for private hire. This would be more to the council's credit to improve safety than worrying about the cc of an engine. Follow up reports of unlicensed cars and companies and punish individuals before the unsuspecting public travel in these vehicles.
94	Dec 12, 2011 1:03 PM	<ol style="list-style-type: none"> 1. Vehicle branded up as PRIVATE HIRE - band on each side of vehicle. 2. Fully Enhanced CRB for ALL drivers (Children & Adults). 3. A uniform & driver's wearing there photo badges, rather than the usual practice of pinning them to the air vents. 4. Limiting the MAXIMUM number of hours that a driver may be behind the wheel, as I have often found driver asleep in the car, obviously they have been on an early shift, worked 'oncall' in the quite times & are still on duty in the late afternoon & into the evening. European working times are 48 hrs Max in any one week, Truck drivers had limits, cars too can KILL - but they are not regulated.
95	Dec 9, 2011 9:06 PM	We have good standards and driver checks. The council should consider more enforcement checks.
96	Dec 9, 2011 4:24 PM	2 /3 yearly review and survey to general public
97	Dec 8, 2011 2:04 PM	Spot checks
98	Dec 7, 2011 10:21 AM	Make all vehicles in Northampton Hackneys and give all drivers hackney licensing. This way there will be no fights, every driver will be out for themselves and every driver and vehicle will be on an equal footing and therefore will have to abide by the same rules.
99	Dec 7, 2011 9:24 AM	Spot checks, which I know are carried out, are a good way to weed out poor vehicles. These should have their license suspended for 6 months as a deterrent.
100	Dec 6, 2011 8:14 PM	<p>Mystery travellers should also be used to report cleanliness of cab & driver, helpfulness, & observing the Highway Code eg not driving over mini- roundabouts, going through amber lights</p> <p>i have seen a hackney taxi cab driver put his cab on a jack leave it their in the road for days on a jack then fix it himself was he qualified he did the brakes then he carries passengers hes a cab driver not a mechanic i think public safety would be better if just a cabby did not do his repairs we wont be using black cabs anymore and ive spread the word with the cabs reg number surely you do not allow this</p>
101	Dec 6, 2011 11:38 AM	<ul style="list-style-type: none"> - Clean cars - Good communication skills - Less taxis, there are too many in this town. - New cars
102	Dec 6, 2011 9:40 AM	Accidents tend to be caused by drivers rather than defects in the vehicles that they drive. If you need to focus on public safety focus on the drivers not the cars.
103	Dec 5, 2011 10:19 PM	Only by enforcing breaches. Do not impose further restrictions
104	Dec 5, 2011 5:13 PM	No

105	Dec 5, 2011 4:59 PM	Make reporting bad experiences more transparent and invite customers to complete a short questionnaire [returnable post paid to NBCLA] which each driver is required to hand to x number of passengers per month.
106	Dec 5, 2011 2:56 PM	More spot checks, follow up instantly on any complaints and reports and make it easier for the general public to complain about any vehicle they feel is unroadworthy. Also any driver or operators found with dangerous or unroadworthy vehicles should have fines imposed on them.
107	Dec 5, 2011 2:00 PM	Stop unnecessary rules such as having an age limit
108	Dec 5, 2011 11:07 AM	No, other than listen to what customers and the drivers themselves say about what could be improved.

Question 13

Can you suggest any other ways in which Northampton Borough Council Licensing Authority could help reduce emissions/pollutants from Hackney Carriage and Private Hire Vehicles?	
Answer Options	Response Count
	88
<i>answered question</i>	88
<i>skipped question</i>	77

Number	Response Date	Response Text
1	Mar 2, 2012 3:42 PM	believe these are tested along with roadworthiness - certainly for MoTs they are. rather than impose general rules about age and mileage, why not limit this directly? (ie any taxi or minicab must demonstrate emissions less than x)
2	Mar 2, 2012 3:30 PM	Please go out on the road and have a good look on so called Hackney carriages the condition and smoke you do not need more suggestion.
3	Mar 2, 2012 2:57 PM	Only to make sure readings are correct
4	Mar 2, 2012 2:48 PM	New cars/vehicles
5	Mar 2, 2012 2:45 PM	Strict test for emissions test.
	Mar 2, 2012 2:41 PM	yes, stop moving them on in the town! Bounds office has double yellow lines. Remove them and allow 3/4 cars to park and wait
6		Remove traffic lights Sty Peters Roundabout, allow taxis up to gold street from rail station. Turn right out of train station instead of heading to a gridlocked St Peters roundabout and getting stressed from passengers who think we are ripping them off! Increase traffic flow not restrict it.
7	Mar 2, 2012 2:38 PM	yes, stop moving them on in the town! Bounds office has double yellow lines. Remove them and allow 3/4 cars to park and wait
8	Mar 2, 2012 12:41 PM	there is many company's that can fit catalytic converters to reduce emissions. I spoke to some coach that go into London city.They have had to have catalytic converters fitted to reduce emissions.
9	Mar 2, 2012 12:20 PM	Sort out the stupid traffic system where a vehicle has to elongate the journey to get to a destination. (St Peters Way/rail Station fiasco).
10	Mar 2, 2012 11:21 AM	Not only private hire and hackney carriages are on road - there are plenty older cars on road without any problem to pollution so why are we after these cars that are twice MOT tested a year.
11	Mar 1, 2012 12:05 PM	Open all bus lanes to us.

12	Mar 1, 2012 11:33 AM	out cap on taxis
13	Mar 1, 2012 11:26 AM	Encourage NCC to eliminate unnecessary traffic signs and the associated delay with vehicles idling. It has been proved that taking whole life cycle into account having older cars has less environmental impact than replacing with new cars.
14	Mar 1, 2012 11:06 AM	Put a number limit of Private Hire and hackney drivers and close the plates for new drivers. Run with the current cars unless buying a hybrid. Other towns have closed their plates - Bedford, Luton, Oxford.
15	Mar 1, 2012 10:05 AM	To introduce saloon cars in Hackney
16	Mar 1, 2012 9:33 AM	Don't you think this is a dual fare? like on new vehicles like TX4 you are charging higher road tax due to higher emissions when other older vehicles are on low tax. In other words you are trying to put higher emission cars on roads and taking low emission ones off the road.
17	Feb 29, 2012 12:28 PM	Regular servicing of the vehicle
18	Feb 29, 2012 12:09 PM	No
19	Feb 29, 2012 12:23 AM	This should be dealt with under the periodic (four monthly) checks.
20	Feb 28, 2012 7:50 PM	Although statute does not permit the limiting of PHV fleets there would be a perfectly legal method of reduction by adopting suggestions above. This would eventually reduce the number of vehicles polluting the environment.
21	Feb 28, 2012 3:35 PM	Continually monitor vehicle improvements and when the time is right go electric.
22	Feb 28, 2012 3:23 PM	No
23	Feb 20, 2012 8:38 PM	The current safety tests are already extremely vigorous and are designed to eliminate all possible emissions/pollutants.
24	Feb 20, 2012 3:40 PM	Just to advise people (drivers) to get their cars serviced regularly.
25	Feb 20, 2012 3:29 PM	many Hackney Cabs are very old such as new cab driven by Tony. having a 3 year limit wont work if u lol??? are being continually plated. No cab over 5 years should be plated for the road.
26	Feb 20, 2012 10:52 AM	More frequent spot checks
27	Feb 20, 2012 9:53 AM	Encourage Hybrids. Turn traffic signals off at roundabouts apart from peak times.
28	Feb 20, 2012 9:42 AM	I don't think theres anything more unless you want us to get a new car every two years
29	Feb 20, 2012 9:33 AM	Turn off engines when no jobs
30	Feb 16, 2012 5:21 PM	By leaving the minimum engine size at 1400cc, or even reducing this to 1200cc.
31	Feb 11, 2012 9:49 PM	Encourage the use of cleaner alternative fuels and hybrid engine technology.
32	Feb 10, 2012 8:11 PM	Allow hackney carriages to use ALL bus lanes for shorter and less polluting journeys.
33	Jan 29, 2012 8:22 PM	Promote EVs, hybrids and low emission engines by linking the fees to the CO2 emissions.
34	Jan 23, 2012 12:16 PM	Specify emission controls on vehicles for private hire and provide financial incentives for those using hybrids, i.e. lower licence charges and testing fees.
35	Jan 19, 2012 4:01 PM	Leave the choice of vehicle to the drivers, and leave the emissions to the legislation for passing the MoT test.
		Don't interfere..

36	Jan 16, 2012 10:43 PM	Working with owners/operators of Hackney Carriages and Private Hire vehicles to promote a high standard of maintenance of the systems that could result in increased emissions/pollutants.
		Perhaps also work with other departments to review road routes permitted for taxis can get easily to destinations such as the bus and rail station.
37	Jan 16, 2012 8:45 PM	This is difficult Hackney Carriage and Private Hire vehicles like all forms of public transport will generally do high mileage and generally be around town centres and schools, but as long as the council adopts polices which are managable without excessive costs this could be an ongoing reduction.
38	Jan 13, 2012 9:23 AM	sorry, don't know
39	Jan 13, 2012 9:18 AM	Make sure the tester does his job best he can
40	Jan 13, 2012 9:15 AM	No comment
41	Jan 11, 2012 4:11 PM	I run a LPG converted vehicle. Personally the more taxi's on LPG the better. At 74.9p per litre it's a no brainer if your doing the miles these vehicles do. NBCLA should champion this.
42	Jan 11, 2012 4:02 PM	Sorry, but I am not a mechanic
43	Jan 11, 2012 3:05 PM	Yes by allowing more routes into town centre as slow moving traffic on week end nights don't help.
44	Jan 11, 2012 2:49 PM	Good service of the vehicle and frequent check ups
45	Jan 11, 2012 2:36 PM	Rethink your ideas on Hybrids (1500cc?)
46	Jan 2, 2012 11:08 AM	Older vehicles could be adapted to conform with more recent EEC emission regulations.
47	Jan 1, 2012 6:53 PM	Give incentives to Owners/Operators that want to plate low emission vehicles
48	Dec 23, 2011 9:00 PM	have different licence prices for different types of cars based on age, emissions etc.
49	Dec 20, 2011 11:02 AM	More heathy checks and emission control
50	Dec 20, 2011 10:57 AM	Stop drivers smoking in vehicles especially while working.
51	Dec 20, 2011 9:50 AM	As a hackney carriage driver I can only comment about allowing such vehicles as the FIAT Doblo be allowed as a Hackney as it is in several other towns. And perhaps only a percentage of hackeneys as wheelchair accessible vehicles.
52	Dec 20, 2011 9:27 AM	none
	Dec 19, 2011 5:00 PM	Reduced fee for vehicles that are hybrid/electric?
53		
54	Dec 19, 2011 3:53 PM	Work with Honda or whoever to arrange a sponsored/discount? Allow private Hire vehicles to park free of charge somewhere in Town centre area when awaiting next booking.
55	Dec 19, 2011 3:36 PM	Make Hybrid car plate a lot cheaper. Cars over 2 ltr should pay more base plate. Fees on emissions like our tax?
56	Dec 18, 2011 3:29 PM	keep the emissions low and new cars are lower on emissions than old cars...
57	Dec 15, 2011 11:00 AM	Possibly relate licensing cost to emissions, higher emissions higher licensing fee.
58	Dec 15, 2011 10:54 AM	No
59	Dec 15, 2011 10:48 AM	As stated before in Q10 encourage the use of vehicles which uswe alternative power such as all electric.
60	Dec 15, 2011 10:32 AM	yes....arrange for the council to have elec charge points located throughout the town. This will assist operators to use electric cars.

61	Dec 15, 2011 10:10 AM	Traffic lights that change from red to green when traffic approaches, especially at night time.
62	Dec 14, 2011 12:39 PM	More spot checks
63	Dec 14, 2011 12:12 PM	No comment
64	Dec 14, 2011 11:57 AM	Allow more access and remove restrictions on no left/right turnings. Example from Wood Hill through to the Guildhall. Allow access for Hackney/private hire at all times from railway station into Marefair. Allow left turn at the bottom of Marefair and left turn from Marefair at Sol Central. Allow turn from Horsemarket into Gold Street.
65	Dec 14, 2011 11:14 AM	Introduce and encourage smaller vehicles for hackney carriage, rather than stick with big fuel smoling tanks.
66	Dec 14, 2011 10:49 AM	n/a
67	Dec 14, 2011 10:19 AM	Newer cars. New start/stop features in vehicles.
68	Dec 14, 2011 10:12 AM	ECO friendly
69	Dec 14, 2011 10:07 AM	Encourage stop/start technology vehicles. This would reduce vehicle engine idling time.
70	Dec 14, 2011 9:53 AM	Keep to stringent emissions as published
71	Dec 14, 2011 9:44 AM	No, cars are tested every six months. This is enough.
72	Dec 13, 2011 5:12 PM	STOP ALL ENGINES RUNNING ON THE ROADS OF BRITAN ROADS,THATS THE ONLY WAY
73	Dec 13, 2011 4:20 PM	No as this should be part of the regular testing
74	Dec 12, 2011 1:03 PM	Limit the number of vehicles allowed in the town centre are - difficult to police - but as these are Private Hire - they should not be parking in the area, as customers need to book in an office. There is already a limit to the number of hackney's allowed in the Town Centre.
75	Dec 9, 2011 9:06 PM	Regular spot checks.
76	Dec 9, 2011 4:24 PM	5 to 10 year plan to move all vehilcals to Hybreds Electric set out time scale so verybody knows and can budget for the change over The new VOLT from GM could be the TAXi for northampton of the future
77	Dec 8, 2011 2:04 PM	Emission are tested for, are they not?
78	Dec 7, 2011 10:21 AM	Ensure all vehicles are tested regularly.
79	Dec 7, 2011 9:24 AM	Instruct drivers to turn off engines while waiting for a fare or when stuck in traffic.
80	Dec 6, 2011 7:42 PM	Consider using LPG powered vehicles
81	Dec 6, 2011 11:38 AM	Have less taxis, too many plying for limited trade.
82	Dec 6, 2011 9:40 AM	I assume emission testing is part of the council's vehicle test (as it is in the MOT). If air pollution is an issue - again there is no evidence of this - then reflect this is the vehicle inspection and impose lower limits.
83	Dec 5, 2011 10:19 PM	Rely on existing legislation for this. Do not add to the burden. The Council should improve its green policies in relation to transport, park and ride and better cycle routes.
84	Dec 5, 2011 5:13 PM	Incentives to use such vehicles.
85	Dec 5, 2011 4:59 PM	Invest in electric and investigate technology already used in other parts of the world where there is less of a 'luddite' attitude.
86	Dec 5, 2011 2:56 PM	Limit the number of vehilces allowed to be licensed.
87	Dec 5, 2011 2:00 PM	Should not have rules over and above national pollution rules
88	Dec 5, 2011 11:07 AM	I believe these are tested along with roadworthiness - certainly for MoTs they are. rather than impose general rules about age and mileage, why not limit this directly? (ie any taxi or minicab must demonstrate emissions less than x)

Question 14

If these proposals were introduced, do you think that any individuals or groups would be more positively or negatively affected than others?		
Answer Options	Response Percent	Response Count
Positively	19.2%	30
Negatively	51.9%	81
Don't know	28.8%	45
Please specify, stating who, and suggesting whaint actions would need to be taken to minimise any potential adverse impacts		84
<i>answered question</i>		156
<i>skipped question</i>		9

Number	Response Date	Please specify, stating who, and suggesting whaint actions would need to be taken to minimise any potential adverse impacts
		Negatively
1	Mar 2, 2012 3:42 PM	Owners of taxis and minicabs might find their costs increase, through having to replace perfectly serviceable vehicles. Considering discrimination, there could be an indirect issue since drivers (and owners?) are disproportionately male and from certain minority communities)
2	Mar 2, 2012 12:41 PM	I think a lot of us would be affected. To buy a new taxi costs £30 - £35,000 and for those renting a taxi that would go up too. At present its about £350pw. With brand new taxis that would increase.
3	Mar 2, 2012 12:20 PM	Hackney and Private Hire vehicle owners would be put to considerable expense when updating their vehicles. When a vehicle reaches the maximum they would have to purchase a vehicle about six years newer, not the 2 or 3 years as before.
4	Mar 2, 2012 11:51 AM	More asians own older vehicle than the others. Introduce these proposals and unemployment make go higher.
5	Mar 2, 2012 11:35 AM	Good Luck.
6	Mar 2, 2012 11:27 AM	It will effect negatively on individuals.
7	Mar 2, 2012 11:21 AM	Mostly drivers depending on what company they work for and how much they earn.
8	Mar 2, 2012 11:03 AM	Hackneys will be negatively affected/mistreated than Private Hire vehicles.
9	Mar 1, 2012 11:33 AM	This consultation is unfair and badly planned/written/asked. I am a PH vehicle driver. If these proposals were introduced then I might be paid more for my weekly rental.
10	Mar 1, 2012 11:06 AM	Not only us but all europe is in big time recession. Those who will have to buy new black cabs will not be able to afford it or make a living out of it. hackney drivers will be affected. Things are difficult for families at the moment. What do we do with the cars that are 8 over years? They still have a good value? Compenmsation for loss of earnings? If vehicles can be sold will they be scrapped which will be use of more energy and resources
11	Mar 1, 2012 10:17 AM	people in the trade may need to stop working and apply for benefits so more cost to the council.
12	Mar 1, 2012 10:05 AM	You will put a lot of us unemployed or in trouble with high rents. Most of the people in this trade have bad credit history and may not be able to get finance again. You are trying to push them to pay more money in the name of rent or cldaim benefit.

- 13 Mar 1, 2012 9:48 AM If the proposals are introduced fares will have to be raised to cover the expenditure incurred. e.g. hire charges by the drivers.
- 14 Mar 1, 2012 9:33 AM Many in this trade have bad credit history and can't get finance so with that proposal you will force them to leave that trade or get a hire car and pay more money for rent. Or claim benefits from job centre.
- 15 Mar 1, 2012 9:18 AM Black cabs worse hit by idea
- 16 Mar 1, 2012 9:16 AM Private Hire
- 17 Feb 29, 2012 12:32 PM Individual will suffer negatively
- 18 Feb 29, 2012 12:28 PM Maybe driver owner be affected more
- 19 Feb 29, 2012 12:09 PM they would all be treated equally around car ownership and standards.
- 20 Feb 29, 2012 12:23 AM Your question didn't really allow for my answer/comment.
The current proposals are too stringent and, in a time when it is quite feasible that someone made redundant may choose to apply to become an owner operator and may be starting out on a carefully-planned budget, the council should honour its policy statements elsewhere to encourage local enterprise. The alternative proposals I have outlined above are fairer than those proposed by the council.
Those that currently run responsible businesses will look at the financial viability and probably source business elsewhere thereby leaving Northampton with the ever growing band of suspect drivers who take chances and fleece passengers who are either drunk or more often whom have overslept and had to take a HC or PHV from Northampton Station to an out of town destination.
- 21 Feb 28, 2012 8:02 PM The public initially at the expense of the drivers.
In current economic climate HC drivers with a tariff rate that has remained unchanged whilst fuel, servicing and plating costs have risen.
- 22 Feb 28, 2012 7:55 PM PH drivers who struggle to make sufficient to service vehicle costs and income.
- 23 Feb 28, 2012 7:50 PM However, it should be implemented over a period to facilitate a better transportation system for Northampton.
- 24 Feb 28, 2012 3:35 PM I don't know the breakdown of drivers/operators
- 25 Feb 21, 2012 1:20 PM Older Hackney drivers who paid around £30000.00 for their vehicle and then hope to work part time after they finish their payment
- 26 Feb 20, 2012 8:38 PM Obviously, every owner/driver of a hackney/private hire vehicle will suffer financially as a result of the new legislation, but as long as the new stringent measures are equally and fairly applied to both hackney and private hires alike, then health and safety will prevail.
Only few people would be able to meet the criteria (drivers).
- 27 Feb 20, 2012 3:40 PM many drivers will be out with no jobs
- 28 Feb 20, 2012 10:52 AM It will affect clients for they will be forced to wait longer pick up times.
Driver owner would be more careful to look after the vehicle well
- 29 Feb 20, 2012 10:02 AM People who have a low income will not be able to afford a new car. People will become unemployed
- 30 Feb 20, 2012 9:53 AM As a private hire driver I would not be able to purchase a less than three year old car and I know that discussing this with my colleagues this would apply to many.
- 31 Feb 11, 2012 9:49 PM Operators will clearly be affected, however the plans do provide for a transition period for vehicles that are already licenced. This period may benefit operators by being extended.

- 32 Feb 10, 2012 8:11 PM These proposals would seem to target the most vulnerable operators who are forced to run older vehicles even if they do so correctly. In the current economic climate this seems unfair.
- 33 Feb 10, 2012 6:50 PM Private owners. It does not matter how old is your vehicle. if it's maintenance properly it will last. as you put on your background infor hackey's are build to last longer. Do you have any proof that a normal vehicles are not build to last.
- 34 Jan 29, 2012 8:22 PM Regular users - considerations will have to be given to the costs of the measures which ultimately will have to be reflected in fares.
- 35 Jan 23, 2012 12:16 PM Might increase fares, which are sometimes already over inflated, as some vehicles will need to be changed due to age. Hybrids cost alot more to purchase so if no incentive to purchase than may get resistance.
- 36 Jan 20, 2012 6:43 PM keep things as they are
- 37 Jan 20, 2012 11:56 AM ADDITIONAL SAFETY AND SECURITY FOR PASSENGERS . MORE RECOGNITION AND STATUS FOR OPERATORS.
- 38 Jan 19, 2012 4:01 PM CUT OUT COWBOYS !
Small 'one vehicle' operators would be affected. This trade is hard enough as it is..!
As already identified by the Licensing Authority Asian owners might be negatively affected more than others on age/capacity restrictions so perhaps vehicle age restrictions should overall be considered as less important than a high standard of vehicle maintenance and presentation. A reasonabel phase in time would help to minimise a negative impact on any particular group.
- 39 Jan 16, 2012 10:43 PM
- 40 Jan 16, 2012 8:45 PM People that rely on a door to door service could be priced out as the proposal will have a cost implication which would have to be passed on eventually to the customer / passenger.
- 41 Jan 13, 2012 9:15 AM It isnt necessary, if this go ahead majority of driver will be affected due to present state of economy.
The public would feel safer in younger vehicles.
- 42 Jan 11, 2012 4:11 PM The taxi drivers and/or cab firms costs may increase which may be passed on the the public.

Dodgy taxi firms may go out of business. Good riddance!
Most, if not all, Taxi drivers will complain and perhaps a reduction of the following years council charge would help sweeten the pill' .
- 43 Jan 11, 2012 4:02 PM Most, if not all, passengers would be delighted.

There could also perhaps be a small increase in hire charges allowed, maybe 1 or 2 %
it would put a premium on on already plated vehicles./ It would put hardship on drivers whose car failed new tests and on operators losing rents making business less stable. Less cars more problems getting people home weekends in an expanding Northampton (safe)
- 44 Jan 11, 2012 3:05 PM
- 45 Jan 11, 2012 2:49 PM private Hire Driver having own vehicle. In this economic declining situation its not possible to replace the car, one who using car 10/12 years old. My point of view to give at least 2 years time to bring these packages into effect.
- 46 Jan 11, 2012 2:36 PM No (as in none of the above)
- 47 Jan 11, 2012 2:26 PM All will affected but majority very bad affected.
- 48 Jan 10, 2012 10:53 AM Owner driver private hire vehicles with only one driver will abviously do a lot less mileage than company cars that are being used 24 hrs per day and therefore be unfairly penalised on several counts.

Any person who has purchased a new vehicle with the intention of running it for a period of 10 to 15 years, possibly as their last vehicle before retirement and running it as a single driver, would be adversely affected by the proposed conditions.
- 49 Jan 2, 2012 11:08 AM

eg I have in the past kept a taxi for 10 years driving myself and employing another driver. The total mileage for this vehicle was 550,000 miles when I exchanged it, still in good condition.

My present vehicle is five years old and only driven part time by myself, has covered 130,000 miles

So by the time it is 15 years old will only have covered at the most 290,000 miles, well below the half a million miles the manufacturers claim it will last. The council will need to support the small businesses where their actions could put too much pressure on small companies especially in light of the current economic climate

50 Dec 23, 2011 9:00 PM

Yes indeed

51 Dec 20, 2011 11:02 AM

52 Dec 20, 2011 10:57 AM

Above speak for themselves and are also against the law

53 Dec 20, 2011 9:50 AM

Of course it would affect all sole traders who own older vehicles and try to maintain them to a good standard. I cannot answer for operators who own several vehicles i.e. A1 cars etc.

54 Dec 20, 2011 9:27 AM

Most of the people who rent their cars out, who make money out of renting their old vehicles, they will be affected the most.

55 Dec 19, 2011 3:53 PM

Many private hire owner/drivers would find it difficult to afford to comply. What with fuel and insurance costs rising as they are, the last thing they need is even more unnecessary expense. The council should be trying to help the private hire community, not bury it under an ever growing mountain of costs and bureaucracy

56 Dec 19, 2011 3:36 PM

After you received good ideas put these on another survey.

57 Dec 19, 2011 11:43 AM

You will have taxi drivers struggling to meet ends and this will cause more flagging and other activities

58 Dec 18, 2011 3:29 PM

The public and licensing authority and maybe some law abiding taxi drivers will be positive about the change but there will definitely be negative comments from the drivers who can not afford the new cars... then maybe they shouldn't be doing the job as they could be putting the public at risk and may not have the insurance to cover a lawsuit if any accident happens and they are not fully covered....

59 Dec 15, 2011 10:48 AM

I think that all private hire and hackney owners would incur more cost to the detriment of the general public who would ultimately have to pick up the tab. surely if the vehicles had to be virtually new for first registration then you run the risk of these vehicles being newer but cheaper quality. You'll have a chinese manufacturer supplying cheap vehicles to satisfy the UK taxi market, being unreliable and made from poor quality materials with a life of a few years. I recently bought a new chinese cheap motorbike. Fell apart in 6 months!

60 Dec 15, 2011 10:32 AM

If three years is top go ahead as opposed to 5 years this could hinder growth within the industry and harm prospective employers

61 Dec 15, 2011 10:19 AM

This will reduce the size of the towns taxi fleet. The public will find transport harder to get and drivers will end up unemployed/priced out.

62 Dec 14, 2011 12:12 PM

These proposals are just meant to put many taxi/private hire drivers or owners out of business and in this economic climate it will be impossible to buy a new car. Not forgetting nothing much is coming from this business anymore.

63 Dec 14, 2011 11:57 AM

Will be more cost to drivers hence more cost to public. Leave things as they are or extend the proposed age limit.

64 Dec 14, 2011 11:14 AM

Taxi business suffering big time. By introducing above proposals trade is worse for a lot of them. Not everybody can afford new cars/vans

65 Dec 14, 2011 10:49 AM

For me, I am individuals I think will be better, because the groups person will be more negatively because the business (business?) may be can be stop and the car to buy will be more expensive.

66 Dec 14, 2011 10:35 AM

It would be financially very difficult to buy a new private hire

67 Dec 14, 2011 10:12 AM

(Group's) being changing 40 cars in two years would be very costly

68	Dec 14, 2011 10:07 AM	It might give drivers more pride in the vehicle they are using
69	Dec 14, 2011 9:53 AM	Hackney trade as some vehicles are older, but safer and better maintained.
70	Dec 14, 2011 9:44 AM	I think there could be a big impact with regards to drivers/owners not being able to afford to put on a car that is 3 years or younger. This could result in them not being able to work, and therefore private and home lives as well will suffer. You could put people out of work.
71	Dec 13, 2011 5:12 PM	WILL BE BIG DISEASTER FOR ALL HACKNEY AND PRIVATE HIRE DRIVERS
72	Dec 13, 2011 4:20 PM	Drivers with older cars who look after there vehicles better than some drivers with more modern vehicles could go out of business
73	Dec 12, 2011 1:03 PM	Private Hire Drivers - Think that they own the road anyway, so any changes will come as a real shock. It would improve safety of the drivers, the passengers, other road users, and members of the public.
74	Dec 9, 2011 9:06 PM	It would help raise the profile of the town. It would improve emmissions.
75	Dec 9, 2011 4:24 PM	any thing that costs extra money will be resisted, the council have a responsibility to its towns folk to provide a good image of npth to all concerned and not be pressurized by some peoples self intrest There are both postive and negative effects.
76	Dec 8, 2011 2:04 PM	Positive : Better, more fuel effecient modern cars. Negative : More annual expense for taxi owners, which will have to be passed on to the fare payer. Customers will feel safer and feel they are getting their moneys worth. Hopefully less accidents / incidents.
77	Dec 7, 2011 10:21 AM	Some drivers may however have to invest more, but this will be an option for them and they will not be forced into anything. Similarly the operators may feel aggrieved as they may initially lose out, but safety for public is greater than financial benefit for businesses.
78	Dec 7, 2011 9:24 AM	Good companies & individuals would benefit if those who flout their license are weeded out. The public would have a greater confidence in their service.
79	Dec 5, 2011 10:19 PM	Drivers would be subject to unnecessary restrictions. Legislation already exists and should not be added to. Accidents should be investigated and acted upon. Is there any evidence that accidents have occurred in older cars?
80	Dec 5, 2011 6:57 PM	I think that owner drivers and smaller taxi companies would be more negatively affected than others. They would have to spend more money on a 3 year old car and then only have a further 5 years to earn enough money to replace the car with another 3 year old car. I don't think this would be economically viable
81	Dec 5, 2011 5:13 PM	I am concerned for taxi drivers whose cars are over the age limit. Two years grace doesn't sound very much, I think 3 would be fairer.
82	Dec 5, 2011 2:56 PM	All drivers, companies and operators will incur major expenses and will put many drivers out of business, Let's put time and effort into working together and not with the council always finding ways to penalise the PH and Hackney industries that create a huge revenue for the Council. drivers/owners - more expense
83	Dec 5, 2011 2:00 PM	users i.e. anyone who does not own their own vehicle - higher fares (or pressure to increase or reduction in vehicles if not profitable)

84 Dec 5, 2011 11:07 AM

Owners of taxis and minicabs might find their costs increase, through having to replace perfectly serviceable vehicles. Considering discrimination, there could be an indirect issue since drivers (and owners?) are disproportionately male and from certain minority communities)

Question15

Do you have any other comments in relation to this consultation?	
Answer Options	Response Count
	83
<i>answered question</i>	83
<i>skipped question</i>	82

Number	Response Date	Response Text
1	Mar 2, 2012 3:42 PM	Base it on evidence - what are the real problems that can be demonstrated, and how can they be tackled DIRECTLY as far as possible. Eg, if emissions is a worry, measure emissions not something else.
2	Mar 2, 2012 2:57 PM	Private Hire vehicles should have same rights as Hackneys i.e. using roads that hackneys use. We all do the same job!
3	Mar 2, 2012 2:41 PM	Think the money spent on this would be better spent on something worthwhile
4	Mar 2, 2012 2:38 PM	Think the money spent on this would be better spent on something worthwhile
5	Mar 2, 2012 12:41 PM	I operate a taxi. Its a metrocab. The body don't go rusty its glass fibre. Seperate chassis.Brakes, steering, brake pipes,carpets, seats, tyres, gearbox, almost everything has been replaced and it gets serviced regular. I don't want to buty a new taxi.
6	Mar 2, 2012 12:20 PM	These age limits have been thrown out on three previous occasions. The government is proposing new legislation for 2013. This may all have to be thrown in the bin by this. What a waste of time and effort.
7	Mar 2, 2012 11:51 AM	Give more power to police to stop and check vehicle on the spot and alcohol test. That is safer for public. I know few drivers drink heavily and drives.
8	Mar 2, 2012 11:35 AM	Bad time to introduce such a bad policy. Can you people individually started spending money in this recession? You will get answer from yourself.
9	Mar 2, 2012 11:21 AM	At September meeting 90% affected drivers and people wanted not to go ahead on this subject - but CHAIRMAN MEETING pushed his opinion to waste money on consultation in recession time for age.
10	Mar 1, 2012 12:05 PM	More on the spot checks would mean the cleaner vehicles for the public and if the bus lanes were available to taxis that could result in cheaper fares.
11	Mar 1, 2012 11:33 AM	Those who do not know the difference between black cabs and saloon cars and the trade and are not bothered about the downfall of the trade cos of recessions should not be making these decisions.

12	Mar 1, 2012 11:26 AM	<p>Safety and image of Private Hire cars is far more influenced by the drivers. Private Hire drivers should set the highest of standards of driving and presentation. In my opinion they often do not. What evidence does NBC have that accident and injury is a problem in relation to the age of a Private Hire vehicle? Without evidence the proposals seem misguided.</p> <p>The Hackney is a British symbol and should be maintained. Can help with tourism.</p>
13	Mar 1, 2012 11:06 AM	<p>As the work involves driving it is difficult to have a very low mileage car unless bought in 2011</p> <p>Will affect peoples lives - loss of earnings - especially with the credit crunch.</p>
14	Mar 1, 2012 10:17 AM	<p>You are trying to follow other councils but for you knowledge we are less earners from them. And you have done nothing to improve our earnings.</p>
15	Mar 1, 2012 10:05 AM	<p>In the time of recession when government not council got enough money the governement is trying to give relief to the ordinary man whereas you are trying to screw us into the ground. You should compare our earnings to London cabbies.</p>
16	Mar 1, 2012 9:48 AM	<p>Because of the above I see no point in introducing the age limit. Who would benefit???</p>
17	Mar 1, 2012 9:43 AM	<p>I just want to get from A to B at a price fair to all.</p>
18	Mar 1, 2012 9:33 AM	<p>In this time of recession where people already struggling even government and even you as a council got no money for your needs. Government is trying to give frelief to ordinary man. You people are trying to put us in more trouble. You should also compare our earnings to London cabbies.</p>
19	Mar 1, 2012 9:18 AM	<p>Forget this idea</p>
20	Mar 1, 2012 9:16 AM	<p>Cancel this consultation</p>
21	Mar 1, 2012 9:14 AM	<p>Carry on as it is now</p> <p>Useless consultation</p>
22	Feb 29, 2012 12:28 PM	<p>Useless questionnaire</p>
23	Feb 29, 2012 12:09 PM	<p>Age limit can be introduced but it should be a good grace period.I.E. 5 years old first plate then five years plating.</p>
24	Feb 29, 2012 12:23 AM	<p>No</p> <p>Simply that the council does not have the best of reputations at present for taking any notice of what the public says, so it will be refreshing to see if any of what I have proposed actually makes it into policy. I emphasise that I am a member of the public with no connection to or which the Hackney or Private Hire trades. The views expressed in this consultation response are my own.</p> <p>1) Take a good hard look at the types of person who hold HK and private hire badges. Often their manner, dress code and personal hygiene willl provide a good insight as to the safety and cleanliness of their vehicles.</p>
25	Feb 28, 2012 7:50 PM	<p>2)Look at the owners / operators of PH businesses and if, as many do, they flought the law with regard to advertising, 'turning a blind eye' to flagging or growing a fleet of vehicles where there is insufficient trade then they are also unlikely to keep their vehicles in a clean and safe manner.</p>
26	Feb 28, 2012 3:57 PM	<p>I yink if this is taken forward it should be taken at least 7 years back</p>

27	Feb 28, 2012 3:35 PM	Vehicle colours should be standardised. i.e. Hackneys Black with a gold band and Pricate Hire yellow with a red band. This gives status to the town
28	Feb 28, 2012 3:23 PM	Some drivers cannot afford to buy new cars
29	Feb 20, 2012 8:38 PM	Yes.. If these measures are to be imposed to hackney carriage vehicles as a "public transport operators" then surely these restrictions should be applied (age limit/emmissions/pollutants/regulatory or otherwise) equally to buses and trains?
30	Feb 20, 2012 3:53 PM	PH - 5 years
31	Feb 20, 2012 3:42 PM	Hackney - 12 years
32	Feb 20, 2012 3:40 PM	PHV and Hackney should have the same law
33	Feb 20, 2012 3:29 PM	I hope you will consider the factors we have raised get rid of old cabs and cars not just the new plating over 5 years dont plate there are too many vehicles 15 - 20 years old
34	Feb 20, 2012 3:20 PM	My comments is to open a new testing MOT centre in Northampton need competition and cheaper testing centre.
35	Feb 20, 2012 3:16 PM	still believe PH cars should be allowed up to 10 years old if passed 6 months PH MOT
36	Feb 20, 2012 10:11 AM	Age of vehicle is by and large irrelevant. An older well maintained vehicle is more safe than a neglected and abused newer vehicle
37	Feb 20, 2012 9:53 AM	Although I know the council carry out driving and language tests I still come across drivers that cannot convers in the most basic english
38	Feb 20, 2012 9:42 AM	yes I do. You want our views but the reality is that the proposals brought forward you are going to do them anyway.
39	Feb 11, 2012 9:49 PM	The proposal to incease the minimum engine capacity doesn't make any sense and will incease relative emission levels.
40	Feb 10, 2012 8:11 PM	If a vehicle is in a fit state to work then its age does not matter.
41	Jan 20, 2012 11:56 AM	WHAT TESTS ARE IN PLACE FOR DRIVERS ? This consultation is a complete waste of time and money (ours..!!)
42	Jan 19, 2012 4:01 PM	Current regulations are quite sufficient to weed out the rogue vehicles and companies, and doesn't need any more interference from the authorities. To waste resources on this is a disgrace. What statistical evidence is there to show that customers are happier riding in a newer vehicle, rather than a clean and tidy vehicle of whatever age..? This consultation relates to Hackney Carriage and Private Hire Vehicles, but many more vehicles are used in the similar transport roles within the borough and these are not included or restricted, if age was the answer to the safety problem then why are coach and bus companies allowed to use much older vehicles to transport school children to and from school.
43	Jan 16, 2012 8:45 PM	
44	Jan 13, 2012 9:23 AM	New cars can have bald tyres just as easily as an old car, this is down to poor maintenance not age of vehicle. No
45	Jan 13, 2012 9:15 AM	I think this is wasting of public money to deal with this issue which is not important. That money can be used in other way to policing public safety

46	Jan 11, 2012 4:11 PM	As a member of the public the seemingly life long fued between the black cab and the private hire drivers at the train station need to be resolved. These proposals would means all vehicles are equal and therefore private hire taxis should be able to pick up at the station just as black cabs do. The public are currently ripped off by black cab there.
47	Jan 11, 2012 4:02 PM	Some Councils do now have all of their Hire cars in Uniform Livery,. and very smart they are too.
48	Jan 11, 2012 3:05 PM	I think the use of the press is to biased. The councillor who went to the papers with 'chicken' comments should not be allowed to chair the committee and also changing rules to suit his situation i.e.only four of you can talk. This uis a democratic country. To give maore time to eliminate/replace the exisiting vehicle. To avoid financial difficulties to the individual.
49	Jan 11, 2012 2:49 PM	
50	Jan 11, 2012 2:36 PM	I may be available for any further consultation if necessary I would be prepared to discuss this matter with the committee
51	Jan 10, 2012 10:58 AM	In this current economic climate we should all betrying to save money and this would be an extra expense.
52	Jan 10, 2012 10:53 AM	Instead opf looking at the age of vehicles the council should start concentrating on the quality of drivers nad the standard of driving i.e. not knowing the town?inability tospeak english/rudeness etc
53	Dec 20, 2011 10:57 AM	Employ a full time enforcement officer/s to work all hopurs 24/7 to enforce all regs for all taxis/cabs to be fair to both not all regs biased for black cabs. Treat all as equal. Stop Hackneys queing other than on ranks
54	Dec 20, 2011 9:50 AM	having been a hackney carriage driver for over twenty years and driving old and new cabs and saloon vehicles can the council come up with any examples of compromising public safety or comfort in the said vehicles that have passed a plating test. I think not. We private hire drivers get abused the miost by customers, than hackney drivers.
55	Dec 20, 2011 9:27 AM	There shopuld only one badge for both hackney and private hire There are too many taxi drivers in Northampton. Do not allow any more NBC need to be more aggresive when it comes to flagging. PH drivers need to be targeted more and I say that as a PH driver myself. Once in a blue moon stings are not good enough it needs to be constant. The same Vehicles are removed
56	Dec 20, 2011 8:59 AM	Yes - I would suggest that the image of the town offered in respect of Hackney and Private Hire vehicles would be improved dramatically by concentrating on an equal degree on the quality of the drivers as on the vehicles. I am willing to bet that if you analyse your complaints that very few will be about vehicles with many more about drivers. i.e. Cleanliness, dress, manners, knowledge of rout, overcharging, ability to communicate, general attitude.
57	Dec 19, 2011 3:53 PM	Think Horse Power?
58	Dec 19, 2011 3:36 PM	Not engine size thus: The new hybrid electric cars Hydrogen Fuel cells coming through will not be excluded by old laws.
59	Dec 19, 2011 11:43 AM	Put a limit on the number of taxi drivers in northampton so you could make a reasonable living

		I do have a comment that relates to taxi.... although it is also a question....
60	Dec 18, 2011 3:29 PM	Who sets the prices for the taxi fairs? is this regulated? and why are taxi drivers/firms allowed to charge so much and some taxis don't even have a meter in their car so they can charge what they like!!!
61	Dec 15, 2011 10:54 AM	I say change the system and introduce new cars and make it more official without bringing the taxi prices up for the customers. I am buying a new Hackney TX4 when I have paid the 5 years HP I will only have 3 years left to bring me up to 8 years. I then would not be able to drive the taxi and so would lose out. there will be no point in buying a new taxi.
62	Dec 15, 2011 10:48 AM	I would have thought that if a vehicle is able to pass a strict MOT test twice a year then whats the problem? Ambulances and county council minibuses are just examined one a year
63	Dec 14, 2011 12:12 PM	Safety should come first, but not at the expense of putting people out of their daily earnings. Introducing age limit is just a way of reducing taxi/private hire number and it has got nothing to do with safety. The safety measures already in place are enough.
64	Dec 14, 2011 11:57 AM	On emissions - Its stated that newer vehicles have less emissions. This is true but colossal emissions are produced in the manufacture of new vehicles so the idea is a false economy. The onus should be on manufacturers to produce more efficient vehicles that last longer (the technology and skill is there. Vehicles produced to fail have more corporate profit. Be practical, use common sense and apply across the board.
65	Dec 14, 2011 11:14 AM	In the above questions you asked about cars/public/how to make more money from drivers but nothing about the drivers for e.g. How we can make their lives easier (Please add next time)
66	Dec 14, 2011 10:49 AM	I think the NBCLA must check the cars sometimes to see if their are clean and nice smell and good condition, because the taxi company they dont care about public comfort. Some cars need to be excluded (No Space) for passenger and luggage ex VW Golf, Peugeot 308, Hatchback Vauxhall Astra Hatchback.
67	Dec 14, 2011 10:19 AM	I think as a tester that a single test station should be reinstated as I see different test standards are giving drivers an excuse to argue points of refusal of their vehicles.
68	Dec 14, 2011 10:07 AM	I think that having two testing stations removed some of the authority the council have over the vehicle standards having one played off the other so reducing the overall high standard
69	Dec 14, 2011 9:53 AM	Private Hire initial 3 year is good, also lifetime of working saloon should be capped at 12 years. No age cap for Hackneys
70	Dec 14, 2011 9:44 AM	No
71	Dec 13, 2011 5:12 PM	STOP GIVING UNDUE ADVANTAGES TO HACKNEY DRIVERS PLEASE
72	Dec 13, 2011 4:20 PM	No
73	Dec 13, 2011 2:00 PM	IT ALL SEEMS VERY UNECESSARY

		Please can you call all drivers both Hackney & Private Hire, with the Police & NCC Inspectors - so that the drivers will be made aware of there responsibilities for there passengers.
74	Dec 12, 2011 1:03 PM	I am horrified to see childern not correctly strapped in cars, rear seat passengers not wearing seat belts, Drivers on mobile phones. IT IS THE DRIVER'S RESPONSIBILITY
75	Dec 9, 2011 9:06 PM	Termination or suspension of the PH or Hackney licience WILL effect your income.
76	Dec 9, 2011 4:24 PM	Thank you for taking this issue forward. none
77	Dec 7, 2011 10:21 AM	Please seek opinions of customers from train station and bus station as sometimes they feel forced to use a Hackney and not allowed to call a private hire vehicle. This will impact the thoughts of whether an age limit should be intorduced in Npton as they are not given the chance to test the competition.
78	Dec 7, 2011 9:24 AM	Private Hire companies should not be allowed to permanently advertise by parking vans with hoardings on grass verges, in on-street parking areas etc County Cars have one by Weston Favell centre on the grass verge for months & another on Wellinborough Rd opposite Beech Ave.
79	Dec 6, 2011 9:40 AM	I am surprised that in these times of cutbacks and tight budgets the council should be spending time and my money considering any unnecessary additional bureaucracy.
80	Dec 5, 2011 5:13 PM	No
81	Dec 5, 2011 2:56 PM	A local PH taxi company collecting night club and pub goers and shoppers will have a more abused and often not so cared about vehicle compared to a licensed Chauffeur driven limousine/ executive travel vehicle. The slightly older executive vehicles are better maintained than some newer local PH vehicles.
82	Dec 5, 2011 2:00 PM	If there was a real safety issue national government would and should legislate to restrict age of vehicles on roads.
83	Dec 5, 2011 11:07 AM	Base it on evidence - what are the real problems that can be demonstrated, and how can they be tackled DIRECTLY as far as possible. Eg, if emissions is a worry, measure emissions not something else.

BLACK CABS



A Comprehensive Review of the Proposal to Introduce Age Limits for Black Cabs & Private Hire Vehicles in Northampton

INTRODUCTION

As a working rule you only know the arguments put forward by the Licensing Officers who are your only conduit for information in and about the Taxi and Private Hire Trade. This document exists to try and redress that imbalance.

IF you have not had many of the **Consultation Questionnaires** returned it is NOT because drivers are apathetic ***but rather they think that the 'discussion' is a phoney whitewash and the decision has already been made.*** Also, if the public have not responded it is because they don't care anyway.

There is a great deal of cynicism regarding the Licensing Officers who are generally held in contempt by the trade as a whole.

The lack of trust in them is so great that people genuinely believe that their Consultation papers would be 'binned' if they came back with an unfavourable response.

The reason that this is being sent to all the members of the Licensing Committee by email first is to ensure that 11 envelopes addressed to all the Councillors who sit on that Committee do not 'just go missing'.

This reflects the level of distrust and sense of betrayal by the Licencing Officers.

The following is intended to be a comprehensive review of the proposal to introduce age limits for Hackney Carriages (Black Cabs) in the Borough of Northampton, examining its viability and consequences.

For the purpose of clarity I will assume that the reader understands nothing about the Taxi trade in Northampton and will not presume a knowledge that is common to all drivers and Private Hire (PH) Company owners, but will take a step by step approach.

It is strange that during the years of affluence in this country the Borough Council had no views at all on age restrictions for either Black Cabs or PH, and ***now*** that we are in the years of austerity, cut backs being made across the country to public services, with rising unemployment, pay freezes (and pay cuts) in the private sector, rising inflation and with things so bad that Mervyn King (Governor of the Bank of England) has repeatedly warned in the national press that the, -

'... British public must prepare themselves for the biggest drop in living standards for 80 years'.

and with everyone experiencing financial hardship, ***you wish to 'upgrade' the vehicles used in the trade! When the turnover is down 30% over the last 2yrs in the Hackney Trade???***

This is laughable and will have the effect of throwing hard working people, many of whom are in the relatively unemployable age bracket of 40-60yrs old, into unemployment who will then claim benefits.

The **perception** that, -

- a) The public will benefit from such an 'upgrade', and
- b) That there will be improved road safety

is a completely specious argument **without any public benefit merit**, or a basis of statistical data proving that many (or *any*) road traffic accidents have been attributed to mechanical failure: especially of the Black Cabs.

The current state of affairs regarding the Taxi and Private Hire trade can squarely be laid at the door of the **Licensing Department** and successive previous councils who have adopted strategies without any regard for their consequences, **who abrogated their legal duty of care to the Hackney Carriage trade, and who acted in breach of their statutory duty under the Local Government (Miscellaneous Provisions) Act 1976, over a period of many years.**

This latter point will be dealt with at length because it has had such a profound effect on the entire Taxi environment which has resulted in regulation when such interference was not necessary, and lack of regulation when it was required.

Some of the aforementioned 'regulation' (and lack of it) also breached competition law under the terms of the **Competition Act 1998 & The Enterprise Act 2003.**

As an addendum to this review you will find:

- Copy correspondence sent to Mr Bayliss and which was also copied to Inspector Rayfield
- A statement issued by London Midland Plc about the abolition of the unlawful '**closed shop**' arrangement at Northampton Railway Station, which was **facilitated and sustained** by Northampton Borough Council through the negligence and/or complicity of its Licensing Officers, which was deemed unlawful by the said Railway Company. In order to minimise their legal liabilities, London Midland applied this ruling to their entire network where there existed similar restrictive trade practice '**access cartels**'.
- A breakdown of the economic reality of owning a Black Cab on finance as experienced by John Hills, the Secretary of the **Northampton Hackney Carriage Drivers' Association.**
- The last two (2) MOT certificates of mine which indicate the low mileage that we are now doing as a result of the economic downturn: **(you will no doubt remember that at the meeting that was open to the public back in September, that Steve Ward declared that each of his vehicles averaged around 100,000 miles per year! I do around 30,000 in my Black Cab).**

1) THE DIFFERENCE BETWEEN HACKNEY CARRIAGES AND PRIVATE HIRE VEHICLES

Hackney Carriages(hereinafter referred to as 'Black Cabs') are purpose built vehicles, predominantly of the iconic 'London Taxi' design, but also include the 'E7' model as well as 'minibus conversions'.

- A Black Cabs (London Style) are built by the **London Taxi Company**, ('LTI') and are of the model designated 'TX'. The older Black Cabs are the Fairway and TX1 models. These have 2.7ltr engines which are capable of doing well in excess of **1 MILLION MILES**
- They operate exclusively from ranks where the public queue for a cab
- They can lawfully accept 'flag' fares from the highway, i.e. where a member of the public indicates that they would like the Taxi to stop and pick them up
- They may also accept work that has been pre-booked
- They are wheelchair accessible
- Depending on their design (i.e. London Cab style, E7, or minibus conversion) they carry between 5 and 8 people **at the same tariff rate**. Black Cabs carry either 5 or 6 people, E7 taxis carry 7, and minibus conversions carry either 7 or 8
- Black Cab fares are set by the Council
- Black Cabs are differentiated from PH vehicles by the colour of the rear council number plate. Previously this was white, but has now changed to brown and white
- **CRUCIALLY** a Black Cab **must be under 3yrs old at first plating, and any older Black Cab must have been previously plated in the Borough, and cannot be introduced from outside the Borough**
- The 3yr age limit at first plating does **not** apply to the E7 or minibus conversion style Hackney Carriage, **which must be new** at first plating
- **A new Black Cab will cost around £35,000, and at 3yrs old will usually cost £16,000 - £18,000**
- **EXEMPTION** from the 3yr rule in if the Black Cab is in '**exceptional condition and has low mileage**'
- **A new E7 or minibus conversion style Hackney Carriage will cost around £26,000 (E7)& £27,000 to £32,000 for the minibus style Hackney Carriage**

Private Hire Vehicles (hereinafter referred to as 'PHV's) are ordinary family saloons or hatchback cars over 1400cc but which may also be varying designs of minibus.

- PHV's **must** be booked in advance
- PHV's work for an '**Operator**' (i.e. **Bounds or A1** etc.)
- They are not permitted to 'flag'
- If a PHV takes a passenger who has NOT be pre-booked **then his insurance for that journey is null and void and amounts to the criminal offence of driving without insurance**
- They receive their work via radio link, or, more usually, by PDA data screen
- PHV's are not permitted to form ranks outside their offices, and **ostensibly**, prospective passengers are not permitted to form queues for their services outside their booking offices
- They are not permitted to stop for a 'flag fare' and **then** allow that person to telephone their operator control office to book them. The proper course is for the booking to be taken and a separate vehicle to be despatched by their Operator
- They pay a **rent**' to their Operator, ostensibly for the radio or 'PDA' device which communicates their pick-up destinations.
- A small minority of PHV's (i.e. vans) are wheelchair accessible but obviously, most family saloon style PHV's are not wheelchair accessible
- The rent they pay to the Operator depends on how much work they receive. i.e. a busy Operator may charge £160 per week whereas a smaller Operator with less work might only charge £80
- PHV's are differentiated from Black Cabs by their *yellow* rear Council number plate, and by the presence of an illuminated roof sign
- The Council does not directly control the tariff of the PHV's
- **CRUCIALLY a PHV does not have to be new at first plating**
- **A PHV may be of any age at first plating and the cost varies between £200 from the Car Auctions to a £35,000 Mercedes or any costly, new, minibus.**

2) DISPARITY BETWEEN PRIVATE HIRE VEHICLES AND BLACK CABS

As can be seen from the above there are significant differences: -

- A Black Cab **must** be under 3yrs old at first plating and **no** older vehicle may be introduced from outside the Borough, **UNLESS it is in 'exceptional condition and with low mileage'**
- A PHV can be **any age** at first plating, and **any family saloon car or minibus of any age** is permissible
- Any appropriate PHV can be introduced from outside the Borough
- A Black Cab will cost anywhere from £27,000 (for the E7 type) to £35,000 for the iconic London Style Black Cab
- A PHV can cost as little as £200 from a Car Auction (as long as it meets the usual MOT criteria).
- The older **Fairway** style of Black Cab together with the older **TX1** style are virtually indestructible and **can provably do over a million miles**
- The overwhelming majority of PHV **non-purpose built family saloons** will be ready for the proverbial 'knackers' Yard' by **300,000 miles**
- **A Black Cab driver must sit a 2 hour written test**
- **A PHV driver must present himself for a 10 minute oral test**

As you can see it is much more arduous to qualify as a Black Cab owner and considerably more **financially onerous** to own a Black Cab than a PHV.

3) THE EFFECT OF THE 3 YR RULE ON THE HACKNEY CARRIAGE TRADE

- Because it is impossible to introduce a Black Cab older than 3yrs into the Borough from outside, this has led to an **artificial value for older Cabs plated within the Borough**
- **Example:** I had to pay **£10,000** for a Black Cab that was 8yrs old, and with a **general market value** (outside the Borough) of only **£3,000**
- In the event of a non-fault accident that writes the Black Cab off, the insurers will **only pay the value of its market price, which is £3,000**, and not the **£10,000** it cost. **This has already happened to drivers in the past.**
- **So much for the Council's Legal Duty of Care in evading the consequences of their own rules!**
- As in the present instance, proposing 8yr or 10yr age limits on highly expensive vehicles (i.e. Black Cabs), **it is easy for a bureaucrat working in the Licensing Department, working on his SECOND index linked pension, and who has NEVER, himself, been involved in any career activity that is measured by productivity and with a pay structure that is performance related, to impose financial burdens on others who are already working at the raw edge of free market economics**

- A Black Cab driver therefore, in the circumstances outlined above has been forced into a £7,000 uninsured risk (and loss) through the thoughtless (mindless) application of a short sighted rule
- The 3yr rule has also ensured that it is sufficiently more financially onerous to purchase a NEW Black Cab, or even an older one plated in the Borough, ***than buying a PHV for £500 from the Car Auctions. This is why the numbers of Black Cabs are artificially too low in Northampton compared to the PHV's***

This is not only ***unconscionable*** but most likely also a ***breach of Competition Law***. It is a state of affairs that is contrary to any public benefit.

NOW, let us examine the **Breach of Statutory Duty** by previous Councils, which has had such a profound effect on shaping the ENTIRE Taxi and PHV trade in Northampton:

4) **NORTHAMPTON BOROUGH COUNCIL'S BREACH OF STATUTORY DUTY AND HENCE LEGAL DUTY OF CARE TO THE HACKNEY CARRIAGE TRADE**

- The **Local Government (Miscellaneous Provisions) Act 1976**, imposes a ***mandatory duty*** on the Borough Council as the Licence Issuing Authority, to police and stop the practice of ***'flagging'*** by PHV's.
- Over a period of ***years*** the Licencing Officers ***seemingly*** made desultory attempts to prevent this widespread practice, and was in ***permanent breach of this provision***. Until recently, with the establishment of what has been designated a ***'temporary Night Hackney Carriage rank'*** in the Drapery, there was a permanent rank of PHV's touting for trade the full length of the Drapery on a Friday and Saturday night, most notably stealing jobs belonging to the Hackney trade from MacDonald's restaurant. The establishment of the rank has now curtailed this activity ***many years too late***. This was only made possible after I wrote a highly pertinent letter to Mr Bayliss that was also copied to Inspector Rayfield (copy enclosed in the 'addendum' section of this report, and which uncomfortably drew their attention to the recent and evolving area of law regarding the offence of corporate manslaughter.
- The combined effect of the consequences of the '3yr rule' being applied only to the Black Cabs, together with no power to restrict the number of PHV's under the ***Act***, and the ***breach of statutory duty*** in failing to prohibit the prevalence of ***'flagging'*** effectively demolished the checks and balances structured into the ***Act***. This resulted in the ***unsustainable growth*** of some ***Private Hire Companies, (notably A1 Taxis)***, which could not provide sufficient legitimate bookwork for their drivers, and which was essentially just a

'licenced flagging operation', with a fleet of around 60PHV's and with bookwork for probably only 6! Since the introduction of the aforementioned temporary night Hackney Carriage rank in the Drapery, which has effectively prevented the *customary mass flagging* activities of the PHV's, *free market economics* have **partially** redressed the balance by making continuation of **A1 Taxis** unviable, and it was sold to **Bounds PH Company** just a few days ago and is now essentially defunct

- This is likely to the scenario of several other PHV's who have similarly been the product of the Borough Council's *breach of statutory duty*

5) Previous Councils Supported and Condoned a Long Standing Restrictive Trade Practice at Northampton Railway Station by Breakaway Group of Black Cab Drivers

- Over a period of about 20yrs a 'closed shop' existed at Northampton Railway Station, the most lucrative Hackney Carriage rank in the County.
- This group of drivers formed an unincorporated association, which under the terms of the **Partnership Act 1890** made every member jointly and severally liable. This rank was closed to approximately half the Hackney Carriage Trade
- The Licencing Department knew of this state of affairs but refused to act, fatuously stating that it was private property and they had no jurisdiction (or right of censure) over a group of drivers who independently contracted with a third party *within the Borough!*
- Such an arrangement was clearly contrary to competition laws, *which the Council knew or ought to have known*
- I brought this matter to the attention of London Midland Plc, who after consulting their legal department, agreed and declared the contract that they had with this 'unincorporated association, *null and void*
- I drafted a case against Alan Payne (Black Cab driver) who, as Chairman was being sued, by John Hills, in a representative capacity on the basis of **joint and several liability**, in the **Chancery Division of the High Court**. The case was dismissed over a misunderstanding about the scheduled trial date. The matter is not dead and an application has been made to renew the proceedings
- The Council, through its Licencing Officers is ultimately liable to the Hackney Carriage Drivers who were unable to earn a living by plying for hire at the most lucrative rank in the town
- **Another 'closed shop' similarly exists at Weston Favell!** The Hackney Carriage Drivers' handbook clearly identifies 3 Taxi ranks from which ALL Hackney Carriages can ply for hire. Over many years, the reality was that only ONE rank could be worked by ALL members
- Even the Hackney Carriage test poses questions relating to the departure from each of the 3 'notional' ranks

- This is just further evidence of the unprofessional and cavalier manner in which the Licencing Department has dealt with the Hackney Carriage Trade
- I would suggest that you consult the Borough Solicitor over your legal position in this matter

6) THE CONSEQUENCES OF ALLOWING SUCH A RESTRICTIVE PRACTICE TO EXIST OVER A 20YR PERIOD

- Because there were a restricted number of Taxis working at the Railway Station it ensured a very good livelihood for those who benefited. The result was that they earned sufficient money so as not to have to work nights or weekends
- This led to a shortage of Black Cabs working in the town centre at nights and weekends, and the opportunity was seized by emergent PVH companies whose cars went out *'flagging'*
- Given the shortage of Black Cabs, and the large number of people who needed to be cleared from the town on busy weekend nights, both the Council and the Police turned a blind eye to the practice of *'flagging'* - *i.e. driving without insurance*
- The recognition of this *illegal closed shop* operating within, and dividing, the Hackney Trade was the direct cause of so many of the problems in the trade
- When you put all these factors together: -
 - a) The 3yr limit on Hackney Carriages entering the trade without a similar restriction imposed on PHV's:
 - b) The prohibitive cost of getting into the Hackney Trade as opposed to PHV:
 - c) The closed shop at the Station making it difficult for new Hackney carriages to enter the trade and earn a living:
 - d) The Council's failure to prohibit PHV's *flagging*:

makes it *galling* that a subsequent Council, which is ignorant of the short sighted legal ignorance and administrative incompetence of its predecessors and its Licencing Officers should now seek to add to the burdens that have been imposed on hard working enterprising people who have enough about them to get off their backsides and risk a significant investment, should NOW, seek to impose age restrictions on perfectly road worthy vehicles!

7) METHODOLOGY OF THE CONSULTATION QUESTIONNAIRE

- The questions which relate to age as a safety factor are *invalid* for TWO reasons: **1)** they presuppose the answer and **2)** they seek the *opinion* of the person, which is *irrelevant*. The '*opinion*' is irrelevant because unless it is based on solid statistical data that **conclusively identifies mechanical failure due to age as a factor in a given number of accidents, it is more prejudicial than probative**
- As such it is outside of the knowledge of the average layman member of the public, *who would then merely express a 'preference'*
- Establishing a '*consensus of ignorance*' through biased questions serves no objective purpose
- If the Council ran a Consultation Questionnaire on Public Spending, would it be a 'skewed' question to ask if the Public would prefer to accept cuts to Public Services but pay the same Council Tax, or just leave things as they are? *The preference or 'opinion' of the layman is irrelevant because the argument is underpinned by economic reality.*
- The questions relating to identical age limits for both PHV's and Black Cabs fail for the same reason. **They provide no differentiation between either the cost or performance of purpose built vehicles versus family saloons, and as such are 'unfair'**
- The superficiality of the questions has no bearing on the substantive arguments raised in this Report, *which exist independently of any consensus of technically uninformed opinion*

8) SUMMARY

- A unified age limit on both PHV's is nonsensical as it does not take account of the disparity in cost, or robustness of the vehicles
- The imposition of any age limit is largely irrelevant as long as the vehicle meets all existing legal criteria
- Unlike family saloons and either E7 or minibus conversions OR minibus's used as PHV's the TX series of Cabs are purpose built, can be stripped down to the chassis and ALL panels replaced
- **Ironically**, it is the older *Fairways and TX1's* which have by far the most robust *engines which have proved themselves capable of doing well in excess of 1 million miles*
- The Council has made the assumption that because 'half' the Boroughs in the country have introduced age restrictions,

- a) this is a good thing, and
- b) that it is preferential as opposed to '*equivocal*'

- Whilst stating that ‘half’ the boroughs in the country have introduced age limits there has been no evident enquiry, or statement regarding whether those boroughs, like Daventry, for instance, have purpose built Hackney Carriages or whether they simply have Ford Mondeos (as does Daventry) which are plated as Hackney Carriages, **ALSO** ignoring the fact Black Cab **plate capping** also exists in many boroughs that have introduced age restrictions (Leicester for instance)
- Plate capping has been introduced in some of those places adopting age restrictions **as a means of protecting the much higher investment needed to provide purpose built, wheelchair accessible vehicles**
- **It would be more useful to upgrade the PHV fleet with the adoption of a similar 3yr restriction on vehicles at first plating, which would prevent the inclusion of cheap and dated looking vehicles from Car Auction rooms. This would also be compliant with Competition Law**
- **The Financial Environment** further militates against introducing upper age limits as the situation is undoubtedly going to get worse in view of the fact that **£1 TRILLION DEBT** has not yet been reduced by ONE PENNY, ensuring that deep and prolonged cuts are inevitable, ***and that this is not the time to be creating more unemployment and hardship when our administrators should be doing all they can to alleviate that hardship***
- **It is absolutely NOT in the Public Interest to impose additional costs on people making such considerable investment (and taking such RISK), which would inevitably have to be passed on to the consumer**
- **Furthermore:** the age limit proposals as they stand would impose a kind of ***economic apartheid*** against those with poor credit histories which would effectively ***deny them the right to work on the grounds of not being creditworthy***
- **IRONICALLY, it is the owners of the older Taxis which have superior engines, and who have already paid for their vehicles, who are best positioned to survive the inevitable economic hardship facing us all.**
- Those with the newer Hackney Carriages with ***mortgagesized monthly repayments are likely to go to the wall***

IF any of the members of the Licensing Committee actually believe that Black Cab drivers are earning vast amounts of money then PLEASE come to Northampton Railway Station at 5.00pm, any week day, and witness how few of the disembarking hordes of passengers catch Taxis.

I personally work between 70 to 90 hours per week (as do most of us) and there is no room for further costs to be imposed on us.

IN CONCLUSION

I would be most grateful if you would not make a final decision without open discussion from the elected representatives of the Hackney Carriage Drivers' Association, namely myself, Paul Bruere (Chairman), and Jonathan Hills (Secretary).

You will find Mr Hills' economic breakdown of the costs of owning a new Black Cab on repayment, in the addendum to this Report, very illuminating.

Paul Bruere LLb



Consultation

Review of the Technical Specifications for Hackney Carriages and Private Hire Vehicles to introduce an age policy and increase of engine capacity for Private Hire Vehicles from 1400cc to 1600cc.

Introduction

On 27 September 2011 the Northampton Borough Council Licensing Committee agreed to consult on the feasibility of introducing age limits for Hackney Carriages and Private Hire Vehicles, to increase the engine capacity of Private Hire Vehicles from 1400cc to 1600cc and associated exemptions

The committee requested that all interested parties, be they in the trade, associated with the trade or members of the public, have the opportunity to have a say.

This is your opportunity to have your say. Here is a link to some background information that you will need to read to complete the questionnaire To complete the questionnaire please click here [\[insert link\]](#).

For a paper copy, more information or help in completing the questionnaire please contact the community safety team on 01604 838986 or email licensing@northampton.gov.uk

The consultation starts on 01 December and runs until 12.00pm 29th February.

What happens after the consultation?

The findings of the consultation will be reported back to the Licensing Committee in May 2012 for a decision to be made on whether to introduce amendments to the Technical Specifications for Hackney Carriages and Private Hire Vehicles.

Background information for Hackney Carriage and Private Hire vehicle consultation.

Nationally around half of local authorities have an age limit for their Hackney Carriages and Private Hire Vehicles in a bid to improve public safety. In Northamptonshire, Daventry, Wellingborough and Kettering have introduced such a policy.

Current age limits in relation to Hackney and Private Hire Vehicles and Technical Specifications for Private Hire Vehicles

In October 1997, Northampton Borough Council introduced a lower age limit for Hackney Carriages. It requires that these vehicles must be less than three years old when licensed for the first time. There is no upper age limit placed on these vehicles thereafter, as they are purpose-built vehicles that are generally more robust than the average family saloon.

There is currently no upper or lower age limit in relation to Private Hire Vehicles. Private Hire Vehicles are usually vehicles representative of the private car fleet e.g. medium/large saloons, people carriers for up to eight passengers and some limousine type vehicles for specialist hire.

The current Technical Specifications for Private Hire Vehicles are:

- 1. That the vehicle is in an immaculate condition both mechanically and cosmetically. There is no age limit on this type of license, but vehicles are expected to remain in a first class condition.*
- 2. That the vehicle is right hand drive. We will not accept any "conversions" from left to right hand drive under any circumstances. The vehicle must not have less than four road wheels. They will still need to pass the Council test.*
- 3. That the vehicle (if a car) has a minimum of 4 doors giving adequate access and egress from the vehicle. The design of the car can be saloon, hatchback, estate, or MPV.*
- 4. That the vehicle has a back seat width (when measured in a continuous line from edge to edge) of at least 1220mm (48 inches).*
- 5. That the vehicle provides easy access from a door to any passenger seat.*
- 6. That the vehicle is constructed or adapted to carry a minimum of 4 passengers in comfort.*
- 7. That the vehicle (if a minibus or "people mover") has sufficient doors of sufficient size to allow passengers to get in and out quickly and safely.*
- 8. It is a requirement of the Council that seat belts be provided for all persons, irrespective of age, and according to the licensed capacity of the vehicle.*
- 9. The license number shall be displayed on the outside of the vehicle on the official plates provided.*

10. Our policy being a vehicle, 4-door saloon or estate of not less than 1400 cc, and includes specific measurements relating to the interior and exterior of the vehicle, and other nominated specialist vehicles.

(Due to the size of the technical specifications for Hackney carriages document we are making them available here, or a copy can be obtained by telephoning the number above).

The licensing authority may not restrict the number of such vehicles.

Currently there are 569 Private Hire Vehicles in Northampton, 140 (24%) of which are over eight years old, and 69 (12.2%) of which are over 10 years old. Of 132 Hackney carriages, there are 30 (23%) which are over 10 years old. We would expect there to be a higher percentage of Hackney carriages over 10 years old as they are purpose built vehicles designed for higher mileages.

When considering adopting an age limit policy, the determining factors that influence local authorities are:

- The interests of public safety
- Reducing pollution/emissions
- Establishing commonality across the trade/improving the overall standard of the fleet
- Ensuring comfort and reliability to fare paying passengers.
- The promotion of quality of life and accessibility

Public safety:

Ensuring licensed vehicles are as safe, reliable and comfortable as possible is the responsibility of local authorities.

There have been significant improvements in safety features by manufacturers that would imply newer vehicles are safer.

During this consultation Northampton Borough Council will also be seeking evidence from local inspectors to help inform the Licensing Committee's decision.

Emissions:

The European Union has developed a number of emissions control measures that all new vehicles must comply with. European emission standards define the acceptable limits for exhaust emissions of new vehicles sold in [EU](#) member states. The [emission standards](#) are defined in a series of [European Union directives](#) staging the progressive introduction of increasingly stringent standards.

For further information see:

http://ec.europa.eu/clima/policies/transport/index_en.htm

Introducing upper and lower age limits could help meet the European emissions regulations by reducing significantly emissions from vehicle exhausts. The European Commission on Climate

Action claim that a 10-year-old vehicle will emit approximately 20 times the emissions of a new vehicle.

Commonality across the trade/improving overall standard of the fleet:

If Northampton introduces an age limit, the question of whether the limit should apply to both Hackney Carriages and Private Hire Vehicles should be considered. A limit that is common to both would mean that all owners have to comply with the same conditions and standards.

At present a Hackney Carriage must be less than three years old when licensed for the first time in order to trade. There is no such condition for Private Hire Vehicles, which means that any vehicle that complies with the Technical Specifications of the Vehicle Policy and passes an MOT test can operate as a Private Hire Vehicle.

Accessibility

Taxis and Private Hire vehicles play an important function in the life of people with disabilities. The Department of Transport report they are used 67% more by people with disabilities. It is essential we consider the needs of people with disabilities and the potential links to the age of vehicles and the benefits to disabled people in relation to their accessibility and quality of life.

Current engine capacity policy

Currently the Northampton Technical Specifications for Private Hire Vehicles requires a Private Hire Vehicle to have an engine capacity of no less than 1400cc. When mini-cabs (Private Hire Vehicles) first began trading they were, as the name implied, small cars that made short journeys. Today a great deal more is expected of them, and airport runs are part of everyday life. The safety and comfort of passengers and drivers is paramount, however, as well as engine capacity, consideration should be given to Brake Horse Power and 'cleaner' engines and not just engine size as these vehicles are often less than 1600cc. However, any vehicle must still comply with the other Technical Specifications for Private Hire Vehicles listed above.

Proposal

1. A Private Hire Vehicle licensed for the first time will be no more than three years old from the date of first registration. This will bring Private Hire Vehicles in Line with the current lower age limit for Hackney Carriages.

Providing the standard is maintained in line with the Technical Specifications for Private Hire Vehicles, Hackney Carriages or Private Hire Vehicle can be licensed for a further five years.

Hackney Carriages or Private Hire Vehicle will not be able to renew that licence once it is more than eight years old from the date of first registration.

2. The engine capacity of Private Hire Vehicles be increased from 1400cc to 1600cc.

Exemptions

- Prestige Vehicles – we cannot give a definitive list of models that constitute a prestige vehicle, however examples would be Bentley, Rolls Royce and vehicles currently

licensed as chauffeur driven vehicles. Each vehicle would be considered on its own merits. A prestige vehicle would not be used for everyday private hire usage, but only available for hire to undertake specific events or contracts where the use of the vehicle is necessary for the running of the vehicle owners business. A prestige vehicle would also have to meet the Exceptional Condition criteria.

- Exceptional Condition

Vehicles of exceptional condition will still be considered for a licence but, should a vehicle fail its first test when over eight years old, it cannot then be considered as being in 'exceptional' condition. To determine exceptional condition the following guidelines will be applied

1. The vehicle must pass the Council vehicle inspection,
2. The bodywork should be in near perfect condition with no signs of panel age deterioration, dents, scratches, stone chips or rust or any other abrasions that may detract from the overall appearance of the vehicle.
3. The general paint condition should not show signs of fading, discolouration or mismatching that may detract from the overall appearance of the vehicle.
4. The interior trim, panels, seating and carpets etc should be in excellent condition clean, free of damage and discoloration.
5. The vehicle service record can be used as supporting evidence of exceptional condition in that a vehicle of exceptional condition would normally be expected to demonstrate regular servicing and maintenance in accordance with the manufacturer's service specification.
6. The vehicle to be in excellent mechanical condition and in all respects safe and roadworthy with no signs of corrosion to the mechanical parts, chassis, underside or body work.
7. The boot or luggage compartment to be in good condition, clean and undamaged
8. Low mileage – Hackneys and Private Hire vehicles generally incur higher mileages than domestic vehicles. In considering low mileage in this context we would view a private hire vehicle or hackney carriage to not have exceeded 15,000 miles for a petrol engine and 20,000 miles for a diesel engine per year since the date of its first registration.

If an age limit is introduced it is recognised that this may affect vehicle owners who currently license vehicles that would not qualify under the proposal. In order to minimise any impact, the introduction of an age limit would only relate to new license applications, with all existing licensed vehicle owners being allowed to license their vehicles for a further two years. So for example a vehicle which is currently 12 years old could be licensed for a further two years as long as it passes the MOT test.

- Hybrid vehicles and those with clean alternative fuels
- Vehicles adapted to facilitate wheelchairs and disabled persons in general

- Disabled drivers who have had substantial adaptations made to their vehicle

Equality Impact Assessment

An Equalities Impact Assessment has been undertaken to consider the potential impacts, positive and negative to groups of people that may be affected by the introductions of these proposals. The Assessment will be reviewed and amended through the consultation as information is gathered and will also inform the decision of the Licensing Committee in May



NBC Hackney Carriage and Private Hire Vehicle Consultation

This is a consultation on the age limits and engine capacity for hackney and private hire vehicles. On 27 September 2011 the Northampton Borough Council Licensing Committee agreed to consult on the feasibility of introducing an age limit for Hackney Carriages and Private Hire Vehicles, increase the engine capacity of Private Hire Vehicles from 1400cc to 1600cc and associated exemptions.

The committee requested that all interested parties, be they in the trade, associated with the trade or members of the public, have the opportunity to have a say.

This is your opportunity to have your say.

We advise you to read the background information which can be found at www.northampton.gov.uk/taxiconsultation or upon request. For more information or help in completing the questionnaire please contact the community safety team on 01604 838986 or email licensing@northampton.gov.uk.

Postal questionnaires can be returned to:

NBC Hackney Carriage and Private Hire Vehicle Consultation
Community Safety Team
Northampton Borough Council
1st Floor, 14 Fish Street
Northampton
NN1 2AA

or hand-delivered to the licensing desk based at the One Stop Shop.

The consultation starts on 5 December and runs until 12 noon on 29 February 2012.

The findings of the consultation will be reported back to the Licensing Committee in May 2012 for a decision to be made on whether to introduce amendments to the Technical Specifications for Hackney Carriages and private Hire Vehicles.

All personal information will be held and used and stored in line with the Data Protection Act 1998. We will use the data you provide solely for the purpose of reviewing Council policy associated with this consultation.

1. Are you? (Please tick all that apply)

- A member of the public
- Hackney Carriage owner
- Hackney Carriage driver
- Private Hire Vehicle owner
- Private Hire Vehicle driver
- Vehicle testing centre/inspector
- Private Hire Operator
- Other (please specify) _____

2. Do you think that the age of a vehicle is related to its roadworthiness?

Yes/No/Don't know

Comments.....
.....
.....
.....

3. Do you think that the age of a vehicle relates to its safety?

Yes/No/Don't know

Comments.....
.....
.....
.....

4. Should Northampton Borough Council Licensing Authority adopt age limits that are common to both Hackney and Private Hire Vehicles?

Yes/No/Don't know

Comments.....
.....
.....
.....

5. If Northampton Borough Council Licensing Authority was to introduce age limits, do you think the proposed age limits are correct?

Yes/No/Don't know

Comments.....
.....
.....
.....

6. Do you think Northampton Borough Council Licensing Authority should have exemptions from the age limit for vehicles that are in exceptional condition and have low mileage?

Yes/No/Don't know

Comments.....
.....
.....
.....

7. Do you think that Council testing for Hackney and Private Hire Vehicles should be increased from twice to three times per year if the Council Licensing Authority did not introduce an age limit?

Yes/No/Don't know

Comments.....
.....
.....
.....

8. Do you think the minimum engine capacity of Private Hire Vehicles should be increased from 1400cc to 1600cc?

Yes/No/Don't know

Comments.....
.....
.....
.....

9. Do you think that Hackney Carriages and Private Hire Vehicles that are adapted to carry wheelchairs should be exempt from age/engine capacity restrictions?

Yes/No/Don't know

Comments.....
.....
.....
.....

10. If the minimum engine capacity of Private Hire Vehicles is increased from 1400cc to 1600cc, should Northampton Borough Council Licensing Authority have exemptions (e.g. for Hybrids, which are generally 1500cc)?

Yes/No/Don't know

.....
.....
.....
.....

11. At present all vehicles, irrespective of age, have to have an MOT certificate and a Council test to receive a plate and are then re-tested by the Council again after 6 months. Should all brand new vehicles be exempt from a Council re-test until 12 months from first DVLA registration?

Yes/No/Don't know

Comments.....
.....
.....
.....

12. Can you suggest any other ways in which Northampton Borough Council Licensing Authority could help improve public safety, reliability and comfort for passengers?

Yes/No/Don't know

Comments.....
.....
.....
.....

13. Can you suggest any other ways in which Northampton Borough Council Licensing Authority could help reduce emissions/pollutants from Hackney and Private Hire Vehicles?

Yes/No/Don't know

.....
.....
.....
.....

14. If these proposals were introduced, do you think that any individuals or groups would be more positively or negatively affected than others?

Yes/No/Don't know

Please specify stating who and suggesting what actions would need to be taken to minimise potentially adverse impacts

.....
.....

.....

15. Do you have any other comments to make in relation to this consultation?

Comments.....
.....
.....
.....
.....

16. What is your ethnicity?

- | | | |
|---|--|---|
| <input type="checkbox"/> White English | <input type="checkbox"/> White & Black Caribbean | <input type="checkbox"/> Chinese |
| <input type="checkbox"/> White Welsh | <input type="checkbox"/> White and Black African | <input type="checkbox"/> Other Asian background |
| <input type="checkbox"/> White Scottish | <input type="checkbox"/> White & Asian | <input type="checkbox"/> Black or Black British Caribbean |
| <input type="checkbox"/> White Northern Irish | <input type="checkbox"/> Other mixed/multiple background | <input type="checkbox"/> Black or Black British African |
| <input type="checkbox"/> White Irish | <input type="checkbox"/> Indian | <input type="checkbox"/> Other Black background |
| <input type="checkbox"/> Gypsy or Traveller | <input type="checkbox"/> Pakistani | |
| <input type="checkbox"/> Other white background | <input type="checkbox"/> Bangladeshi | |

Other (please specify)

17. Please state your gender

- Male
- Female
- Prefer not to say

18. Do you consider yourself to have a disability?

- Yes
- No
- Prefer not to say

Thank you for taking part. If you are interested in taking part in further consultation activity you may like to join our Residents' Panel. Please visit www.northampton.gov.uk/residentspanel for more details.

Appendix 3e



NORTHAMPTON
BOROUGH COUNCIL

Equality Impact Assessment Part 1: Screening

When reviewing, planning or providing services Northampton Borough Council needs to assess the impacts on people. Both residents and staff, of how it works - or is planning to – work (in relation to things like disability). It has to take steps to remove/minimise any harm it identifies. It has to help people to participate in its services and public life. “**Equality Impact Assessments**” (EIAs) prompt people to think things through, considering people’s different needs in relation to the law on equalities. The first stage of the process is known as ‘screening’ and is used to come to a decision about whether and why further analysis is – or is not – required. EIAs are published in line with transparency requirements.

A helpful guide to equalities law is available at: www.northampton.gov.uk/equality. A few notes about the laws that need to be considered are included at the end of this document. Helpful questions are provided as prompts throughout the form.

1 Name of policy/activity/project/practice	This is a change to the: Technical Specifications for Hackney and Private Hire Vehicles
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2. Screening undertaken (please complete as appropriate)	
Director or Head of Service	Steve Elsey
Lead Officer for developing the policy/activity/practice	Bill Edwards
Other people involved in the screening (this may be people who work for NBC or a related service or people outside NBC)	Steve Elsey, Debbie Ferguson, Licensing , Legal Team, Silvina Katz, Communications Team, Vehicle Operator Standards Agency, Lindsey Ambrose - Equalities

3. Brief description of policy/activity/project/practice: including its main purpose, aims, objectives and projected outcomes, and how these fit in with the wider aims of the organisation.

Please note that Hackney Carriages are more commonly known as Black Cabs and Private Hire vehicles are the general vehicles used as mini cabs identified by the yellow bubble on the roof.

To inform the review of the Vehicle Technical Specifications undertaken by the Licensing committee to determine whether an age limit be introduced to both Private Hire and Hackney Carriages. We will be consulting with stakeholders to identify issues and gather evidence in order to compile the final report.

Currently, a lower limit age restriction does apply to Hackney carriages but there is none in relation to Private Hire vehicles. Therefore the proposal is to bring Private Hire vehicles in line with the lower limit that cover Hackney carriages and to introduce an upper limit common to both. The proposal is that, any Private Hire Vehicle licensed for the first time will be no more than 3 years old from the date of first registration and, providing the standard is maintained, the vehicle will be licensed for a further 5 years.

A Private Hire vehicle will not be able to renew that licence once it is more than 8 years old from the date of first registration. If agreed, the new proposals will only apply immediately to new licenses. Existing vehicles that are older than 8 years can continue to be licensed for another two years as long as they pass the MOT test.

It is also proposed that the current allowable engine size for a Private Hire vehicle increases from 1400cc to 1600cc. This would result in all Licensed Vehicle being a minimum of 1600cc. We are considering exceptions to the engine capacity for hybrid vehicles, those that have wheelchair access; and adaptations for disabled people; vehicles that have been adapted for disabled drivers and vehicles in exceptional condition

4 Relevance to Equality and Diversity Duties

In undertaking this work we are considering our duties in relation to improving the quality of life of people of all groups in Northampton and promoting equality and accessibility.. The 2009 Northamptonshire Strategic Needs assessment shows that Northants has a higher than average rate of people who have a physical disability. There are 29,750 people in the County claiming Disability Living Allowance. Research suggests that Nationally, 1 in 5 adults and 1 in 20 children have a disability. Taxis and Private Hire vehicles therefore play an important function in the life of people with disabilities with the Department of Transport reporting that they are used 67% more by that group. It is essential we consider the needs of people with disabilities and the potential links to the age of vehicles and the benefits to disabled people.

By having a common age policy covering hackney carriages and private hire vehicles all drivers will be bound by the same conditions in relation to age, whereas at present hackney owners cannot license a vehicle which is older than 3 years at first plating. There is no such restriction facing Private Hire owners

This will provide commonality across the trade and will ensure that any new design requirements introduced to vehicles that contribute to accessibility and public safety will be definitely be incorporated into the Northampton fleet. Under the present policy this would not be the case.

Key issues that surround the implementation of a vehicle age limit policy are those of the promotion of improved quality of life, accessibility, public safety, and emissions/carbon management. We will be consulting as to whether evidence exists to substantiate these views locally to assist in the decision whether to introduce the proposals.

The policy will impact upon private hire vehicle owners whose vehicles do not fit within the limits of the new proposals. It will require those vehicle owners to purchase newer vehicles if they want to

continue to trade At this stage records held within the Licensing department show that approximately 50% of Hackneys are owned by drivers of an ethnic minority, but of the 132 Hackneys currently licensed 30 (22%) would fall outside of the proposal in relation to age. There are currently 566 Private Hire vehicles that are currently licensed, of which 69 (12%)

would not meet the age limit proposal. We have also identified that 62% (61) of the owners/drivers of Private Hire and Hackney carriages that fall outside of the proposal are of an Asian background. This shows that the proposal currently has a disproportionate effect on that group. However, further work will need to be undertaken to identify any specific group. It is also possible that one individual owns a number of vehicles. We will be undertaking further work to find this out.

Only six Private Hire vehicles have an engine capacity of less than 1600 cc, and those are the Hybrid vehicles which have an engine capacity of 1500cc. We will be consulting as to whether these green hybrid cars should be exempt from the engine capacity limit. The bulk of the private hire fleet is made up of operators who own a number of vehicles.

In order to minimise the effect of the change of policy we intend to introduce the changes over a two year period. This will minimise the impact and number of vehicles and owners that will be affected.

Vehicle age limit policies are currently in place by approximately 47% of local authorities. Some authorities have been unsuccessful in implementing policies due to either unwillingness by the trade and public in the area, or by mistakes made by the authority during the consultation process.

Review of EIA – 23rd March 2012.

The consultation has now finished and results compiled for a final report to go to Licensing Committee on the 8th May 2012.

Question 14 of the consultation asked if any specific group would be either negatively or positively impacted upon by the introduction of the proposed age limit or change to existing policy.

The significant majority felt that Drivers/Owners/Operators would be significantly impacted upon as it would create financial hardship as there would be a requirement to purchase newer vehicles on a regular basis. It would result in many going out of business causing hardship on themselves and their families. This would be compounded by the current financial climate. It would also have an indirect effect on the paying public as increased costs to the trade would be passed on to customers.

If you have indicated there is a negative impact on any group, is that impact:

Legal?

Yes If an age limit is adopted, Mitigation would have to be considered and implemented where required..

No

Please explain: We are consulting with all interested parties including those owners who may be affected by the proposals.

There is no intention for the proposal to have a negative impact on any particular group. The proposal is aimed at providing a safer, greener and more accessible fleet of Private Hire and Hackney Vehicles in Northampton.

5 Evidence Base for Screening

Link for Newport failure to implement age limit –

<http://www.newport.gov.uk/stellent/groups/public/documents/report/cont531888.pdf>

Sunderland vehicle policy

<http://www.sunderland.gov.uk/CHttpHandler.ashx?id=2551&p=0>

Equality Human Rights Commission

<http://www.equalityhumanrights.com/resources/case-studies-of-how-organisations-are-using-the-duties/case-studies-equality-impact-assessments/>

Improving access to Taxis

<http://www.internationaltransportforum.org/pub/pdf/07TaxisE.pdf>

Vehicle Owner Ethnicity - NBC Licensing Records.

Multi agency checks – Multi agency checks with VOSA have not been undertaken this year due to VOSA work commitments. VOSA will be engaging in the formal consultation as will our local MOT inspectors Jackson and NCS. Records of our own vehicle checks carried out by Licensing enforcement officers show a higher number of older vehicles having defects. Through the consultation we will collate more information from our inspectors to assist the decision.

6 Requirements of the equality duties:

(remember there's a note to remind you what they are at the end of this form and more detailed information at www.northampton.gov.uk/equality)

Will there be/has there been consultation with all interested parties?

No but it is intended

Initial consultation has taken place internally to ensure we are proceeding with this process in the correct way. There has also been some press interest and vehicle owners are aware of the proposal following the Licensing Committee meeting on the 27th September.

We are planning to go out to full consultation at the end of November. It will run for 12 weeks

Are proposed actions necessary and proportionate to the desired outcomes?

Yes

We believe that we should go out to consultation in relation to this issue. We are aware of the potential impact and are therefore not predetermining any decision. We feel that the introduction of these proposals are reasonable to assess our desired outcomes of improved public safety, a cleaner environment and more accessible methods of transport.

Where appropriate, will there be scope for prompt, independent reviews and appeals against decisions arising from the proposed policy/practice/activity?

Yes

Any decision taken by the Licensing Committee can be appealed through the Magistrates Court and by Judicial review

Does the proposed policy/practice/activity have the ability to be tailored to fit different individual circumstances?

Yes To a point

We are including proposals in relation to exemptions for vehicles classed as being in exceptional condition, for vehicles that are wheelchair accessible, adapted for disabled persons or for a disabled driver. We are also proposing a two year period which will not require existing vehicles older than 8 years old to comply for two years

Where appropriate, can the policy/practice/activity exceed the minimum legal equality and human rights requirements, rather than merely complying with them?

From the evidence you have and strategic thinking, what are the key risks (the harm or 'adverse impacts') and opportunities (benefits and opportunities to promote equality) this policy/practice/activity might present?

	Risks (Negative)	Opportunities (Positive)
Race	We have identified that owners	Immigrants looking for work

	<p>from an Asian background may be disproportionately affected by these proposals. We will be gathering further evidence through the consultation to identify the extent of any impact and potential measures to address.</p> <p>Updated 23/3/12 – It was identified during the consultation that there could be a disproportionate negative impact on drivers/owners from minority backgrounds as they tend to drive older vehicles.</p>	<p>and who become drivers will have some protection from having to drive the vehicles of fleet owners which are older and potentially less safe.</p>
Disability	<p>The introduction of the proposals may result in a reduction of wheelchair accessible vehicles. We will gathering further information during the consultation.</p> <p>Update – 23/3/12 The consultation resulted in some concerns that if exemptions from age limits were allowed for wheelchair carrying taxi's then disabled could be seen as having to utilise older vehicles than able persons.</p>	<p>Any requirements to new vehicles in relation to disability will be passed on to that group. Fewer emissions will have a positive impact on those with breathing or repertory disorders</p>
Gender or Gender Identity/Gender Assignment	No risks have been identified at this stage	
Pregnancy and Maternity (including breastfeeding)	No risks have been identified at this stage	Consultation may find that this group will feel safer in newer vehicles.
Sexual Orientation	No risks have been identified at this stage	
Age (including children, youth, midlife and older people)	A reduction in the number of purpose built hackney carriages could have a negative impact on elderly people and small children due to their low chassis and grab rails for ease of entry exit.	
Religion, Faith and Belief	No risks have been identified at this stage	
Human Rights	No risks to Human rights have been identified at this stage	

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7 Proportionality

There is a definite risk that some owners will be affected and those groups shown could also be affected.

The consultation will attempt to ensure that all groups have an opportunity to input into this process.

There will be online and paper consultation questionnaires, residents panels and associations will be contacted. All drivers and owners will be contacted and provided with the information they need.

Language line will be offered to those who require it.

We will also be utilising the various forums organised by Northampton Borough Council.

Updated 23/3/12

As stated above, consultation results indicate there could be a negative disproportionate impact upon BME drivers/owners as many tend to drive older vehicles and are not in a position to purchase newer cars or are not creditworthy. This could lead to unemployment and hardship for them and their families.

8 Decision

Should an age limit be adopted by the Licensing Committee, Mitigation will need to be considered and implemented to minimise any potential negative impact.

Date of Decision: .../.../20...

EITHER: We judge that a full impact assessment is not necessary since:

OR: We judge that a full impact assessment is necessary since:

Equality Duties to be taken into account in this screening include:

Prohibited Conduct under The Equality Act 2010 including:

Direct discrimination (including by association and perception e.g. carers); Indirect discrimination; Pregnancy and maternity discrimination; Harassment; third party harassment; discrimination arising from disability.

Public Sector Duties (Section 149) of the Equality Act 2010 for NBC and services provided on its behalf: (due to be effective from 4 April 2011)

NBC and services providing public functions must in providing services have due regard to the need to: **eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations between different groups.** 'Positive action' permits proportionate action to overcome disadvantage, meet needs and tackle under-representation.

Rights apply to people in terms of their "Protected Characteristics":

Age; Gender; Gender Assignment; Sexual Orientation; Disability; Race; Religion and Belief; Pregnancy; Maternity. But Marriage and Civil Partnership do not apply to the public sector duties.

Duty to "advance equality of opportunity":

The need, when reviewing, planning or providing services/policies/practices to assess the impacts of services on people in relation to their 'protected characteristics', take steps to remove/minimise any negative impacts identified and help everyone to participate in our services and public life. **Equality Impact Assessments** remain best practice to be used. Sometimes **people have particular needs** e.g. due to gender, race, faith or disability that need to be addressed, not ignored. NBC must have due regard to the **duty to make reasonable adjustments** for people with disabilities. NBC must **encourage people who share a protected characteristic to participate in public life** or any other activity in which their participation is too low.

Duty to 'foster good relations between people'

This means having due regard to the need to **tackle prejudice** (e.g. where people are picked on or stereotyped by customers or colleagues because of their ethnicity, disability, sexual orientation, etc) and **promote understanding**.

Lawful Exceptions to general rules: can happen where action is proportionate to achieve a legitimate aim and not otherwise prohibited by anything under the Equality Act 2010. There are some special situations (see Ch 12 and 13 of the Equality Act 2010 Statutory Code of Practice – Services, Public Functions and Associations).

National Adult Autism Strategy (Autism Act 2009; statutory guidelines) including:

to improve how services identify and meet needs of adults with autism and their families.

Human Rights include:

Rights under the European Convention include not to be subjected to degrading **treatment**; **right to a fair trial** (civil and criminal issues); **right to privacy** (subject to certain exceptions e.g. national security/public safety, or certain other specific situations); **freedom of conscience** (including religion and belief and rights to manifest these limited only by law and as necessary for public safety, public order, protection of rights of others and other specified situations); **freedom of expression** (subject to certain exceptions); **freedom of peaceful assembly and to join trade unions** (subject to certain exceptions); **right not to be subject to unlawful discrimination** (e.g. sex, race, colour, language, religion, political opinion, national or social origin); **right to peaceful enjoyment of own possessions** (subject to certain exceptions e.g. to secure payment of taxes or other contributions or penalties); **right to an education**; **right to hold free elections by secret ballot**. The European Convention is given effect in UK law by the Human Rights Act 1998.

NORTHAMPTON BOROUGH COUNCIL

LICENSING COMMITTEE

Tuesday, 27 September 2011

COUNCILLORS PRESENT: Councillor Caswell (Chair) Councillors I Choudary, Conroy, Duncan, Eales, Eldred, Ford, Nunn, Sargeant, Strachan and Wire

PUBLIC SPEAKERS Mr Ward
Mr Darlington
Mr Wilshire
Mr Russel
Mr Shah

1. APOLOGIES

There were none.

2. MINUTES

The minutes of the meeting held on the 28th June 2011 were signed by the Chair.

3. DEPUTATIONS / PUBLIC ADDRESSES

That Messrs Ward, Darlington, Wilshire, Russel and Shah be granted leave to address the Committee on Agenda Item 7 – Hackney and Private Hire Vehicles – Introduction of age policy.

4. DECLARATIONS OF INTEREST

Councillor Choudary declared a personal and prejudicial interest in Item 7, as several Hackney and Private Hire vehicle owners present at the meeting knew him. His wife is also the holder of an operators license.

5. MATTERS OF URGENCY WHICH BY REASON OF SPECIAL CIRCUMSTANCES THE CHAIR IS OF THE OPINION SHOULD BE CONSIDERED

The Chair was of the opinion that the following item was a matter of urgency due to the undue delay if it were deferred:

The Members attend the Private Hire Induction Course for new drivers to be held on the 10th October 2011.

RESOLVED:

That the report be noted.

6. APPLICATION FOR A CHANGE IN THE SEX ESTABLISHMENT LICENCE CONDITIONS.

The Licensing Officer outlined the report and explained that an application had been received by Simply Pleasure Ltd for an amendment to the Council's Sex Establishment License conditions, to allow for an 'Open Window Display' at their premises at Wellingborough Road, Northampton.

Colour photographs of window displays for other Simply Pleasure establishments were submitted and circulated to committee members. An objection letter received from Mr D Matthews, by the licensing department was also distributed to members.

In response to a question asked by the Committee, the Licensing Officer reported that the authority would be able to regulate what was deemed acceptable with regards to the suitability of the goods on display. He also confirmed that no objections had been received from the Police. In answer to a further question, the Licensing Officer explained that should there be a breach of the any condition placed on display in the shop window the Licensee could be bought back before the Licensing Committee, which could result in the revocation of the license.

Members considered whether the window display would be anymore controversial than the lingerie models displayed in the windows of other high street stores and whether prohibiting a display for Simply Pleasures would be contradictory.

Members considered the location of the shop and it's proximity to schools. Concern was voiced that the shop was in a school catchment area, which included a wide number of schools catering for different ages. It was suggested that the name of the shop itself indicated it's nature and therefore a window display would not be considered necessary.

Members voiced concerns that there seemed to be an inconsistency of items displayed in the various shop front displays circulated to Committee Members. The Licensing Officer explained that the authority would be stringent in their approach and could stipulate conditions the members would wish to place on the establishment.

The Solicitor explained that there was no legal definition of the word 'indecent' but commented on the dictionary meaning 'unbecoming, highly unsuitable or inappropriate, contrary to the fitness of things, in extremely bad taste or grossly offensive' quoted case law and also informed members that they should be mindful to consider whether the display would be offensive to the 'reasonable man'.

The Licensing Officer explained, in answer to a question, that a condition could be imposed, which would restrict the view into the shop beyond the window display. He confirmed that in the event of conditions being broken, the whole license would be breached and thus could be bought before the committee at a later date.

The Licensing Officer commented that should the Committee be minded to approve the report that an additional condition in respect of the prior by the Council of display, advertisement, word, letter, model, sign, placard, board, notice, device, representation, drawing, writing or any matter or thing (whether illuminated or not) shall be exhibited so as to be visible from outside the premises.

Councillor Wire suggested deferring the matter to see what they proposed to put in the window display.

Councillor Strachan proposed and Cllr I Choudary seconded 'that the proposed change in the Sex Establishment License Conditions be not agreed'.

Upon a vote, the result was tied. Upon the Chairs casting vote the motion was defeated. Councillor Caswell commented that he felt enforcements would be able to keep abreast of this.

RESOLVED:

That the application for a change in the Sex Establishment License Conditions to allow an open window display be approved subject to an additional condition that:

No display, advertisement, word, letter, model, sign, placard, board, notice, device, representation, drawing, writing, or any matter or thing (whether illuminated or not) shall be exhibited so as to be visible from outside the premises except:-

- a) Any notice of a size and in a form approved by the Council which is required to be displayed so as to be visible from outside the premises by law, or by any condition of License granted by the Council.
- b) Such display, advertisement, word, letter, model, sign, placard, board, notice, device, representation, drawing, writing, or any matter or thing as shall have been approved by the Council.

Alterations or additions either internal or external and whether permanent or temporary to the structure, lighting or layout of the Premises shall not be made expect with the prior approval of the Council.

7. HACKNEY AND PRIVATE HIRE VEHICLES. INTRODUCTION OF AGE POLICY.

The Chair clarified that the purpose of the report was not to decide whether an Age Limit is put on Private Hire or Hackney vehicles, but to decide whether the Committee should move towards a consultation. If, on reading the report, they decide that there is evidence to support an age restriction on vehicles, then all those interested parties including the trade, would have an opportunity to put their representations forward in writing through the appropriate channels.

Mr Ward addressed the Committee and commented that he took exception to the report and stated that it factually incorrect. He suggested that should the policy be introduced, a false market would be created with the number of high mileage vehicles retaining value and under 3 years old still being within the law. He suggested that should there be a change in the policy it would be preferable to put a maximum age limit on the vehicle rather than a minimum.

The chair informed Mr Ward that should the consultation process be approved, he would be given the opportunity to bring his comment to the Committee.

Mr Darlington commented that having recently purchased 7 hybrid taxis, the proposed increase in engine size for private hire vehicles would leave his fleet somewhat redundant and suggested that should there be a review in engine capacity, it would be more effective to review the brake horsepower rather than engine size. He stated that the new hybrid cars and cars with smaller cc were out performing larger engine sized cars and were also less damaging to the environment as they had less damaging emissions. He questioned where the Councils green policy was and commented that greater consideration be given to environmental issues.

The Solicitor reported that should the consultation process be approved, people would be contact and given the opportunity to address the Committee.

Mr Wilshire, the Chair of the Private Hire Association spoke about the financial implications and costs that would be incurred by hackney and private hire drivers should the policy be put out to consultation and approved. He reported that taxi drivers were already suffering financial hardship due to the economic slowdown and changes to the policy would have a severe and detrimental financial affect on many drivers.

The Chair asked that Mr Wilshire put his concerns in writing during the consultation process, should the Committee approve it.

Mr Russell addressed the Committee and reported that it would not only be the private hire and hackney drivers that would be affected, should the policy be introduced, but the public would also suffer as a result as the costs of fares would have to increase to address the increased expense. He commented that the policy was corrosive and short sighted and that there had been no injuries due to any vehicle that had failed a safety inspection. He suggested that the robust plating system already in place was enough of a measure to ensure the safety of taxi users.

The Chair commented that 63 taxis had been taken off the road as a result of failing spot safety checks.

Mr Shah informed the Committee that he was speaking on behalf of a number of Pakistani drivers who would be affected should the policy be approved, post consultation. He asked that Members reject the consultation, as it was in the view of those he was representing, unnecessary. He claimed that the introduction of the policy would have a disproportionate effect on the Asian community and suggested that the Council would need to apply themselves in engaging with taxi drivers whose English was not their first language if the consultation process were to be approved. He stated that drivers would be adversely affected due to the economic climate and that consultation rules must be carefully followed should the Committee decide to approve the consultation process. He also gave mention there was perceived unfairness to the policy between Hackney and private hire drivers.

Members agreed that should there be a consultation, the technical information brought before the Committee would need to be examined. They discussed the importance of giving consideration to environmental factors during the consultation process if approved, and were minded to consider the financial implications of the consultation. The Licensing Officer explained that due to financial constraints and for the sake of transparency and fairness, an independent and external consultation could be carried out. However, the Chair reported that he would like the consultation process carried out in-house and the costs would be met under the Director of Environment and Culture.

Members discussed whether or not the consultation process should be conducted as a blank canvass with none of the pre-requisites being considered.

RESOLVED:

That the consultation process with interested parties as to the feasibility and necessity of introducing a combined Hackney and Private Hire vehicle age policy be agreed.

8. LICENSING ACT 2003. REDRESSING THE BALANCE. RECOMMENDATIONS FOLLOWING CONSULTATION.

The Licensing Officer outlined the report and informed Members of the recommendations following the consultation process, which sought to redress the balance between the applicants for licences and the Responsible Authorities, which would give more powers to the Local Authority when considering applications.

RESOLVED:

That the report be noted

9. EXCLUSION OF PUBLIC AND PRESS

The Chair moved that the Public and Press be excluded from the remainder of the meeting on the grounds that there was likely to be disclosure to them of such categories of exempt information as defined by Section 100(1) of the Local Government Act 1972 as listed against such items of business by reference to the appropriate paragraph of Schedule 12A to such Act.

The Motion was Carried.

The meeting concluded at 7.50pm

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