

## Appendix B

North Devon Council Hackney Carriage and Private Hire Policy Amendments.

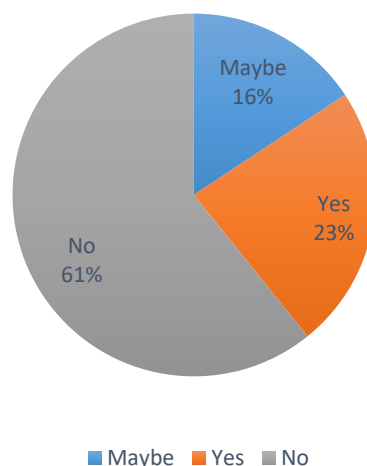
This consultation ran from 16 March 2022 until 11 May 2022.

52 responses were received.

### Q1 Do you agree with the proposal to reduce the upper age limit for vehicles at first licensing?

Option	Responses
Maybe	8
Yes	12
No	31

#### 1. Do you agree with the proposal to reduce the upper age limit for vehicles at first licensing?



### Q2 We asked for any comments on question one.

26 comments were made.

Just a blunt tool and will impact on taxi services

The cost of these vehicles means not everyone will be able to afford it, you will see a decline in taxi numbers within Barnstaple.

Or less if possible as things are changing so fast

Requiring a newer (and therefore more expensive vehicle) would increase overheads on an already slim profit margin given the high insurance and day to day running costs. All taxi drivers would love to drive more modern and environmentally friendly vehicles but simply cannot afford them.

Its hard enough to get started with a new car upto 5 years old at present with running cost and fuel prices

Hackney license vehicles are very well looked after and specifically looking at the No2 and carbon output of the vehicle ages up to 3 years are very similar if not very equivalent of vehicles of that ip to 5 years. This would just impose for those in the industry with limited funds (affected by covid 19 ) u able to upgrade or buy new vehicles in there price ranges

Taxi Work is slim on the ground so to add this expense is not reasonable when so many good cars upto 5 years old still available and perfectly fit for purpose.

Using an arbitrary age is grossly unfare. It does not take in to account any other factor, such as millage

As a Taxi operator, the financial impact this would have on my company would be catastrophic.

Because this will price people out, it will add on between 2000 to 3000 the newer the vehicle, this for some people just isn't workable.

Total costs of operation are getting too high

1. Stage coach and other PSV carrier operate a large fleet of 10 plus year old vehicles without restriction. 2. limiting the age of vehicle with the additional strains of Covid 19 pandemic loss of earnings would result in a major influx of unemployed Taxi drivers being unable to afford new vehicles having already placed fund in maintaining current ones 3. Specifications on vehicles in the last 5 year ( excluding fully electric vehicles ) have very similar output of green house gases but also the lack of charging ports located wouldnt make full electric an alternative this would require a lot of infustructure expsasion

If people don't buy a new car they opt for what is affordable and a 5 year old car may be all that can be afforded at that time.

It will make it harder for younger people to get into the profession without getting into unnecessary debt

Older cars are just as clean if they're well-maintained

If the vehicle is well maintained and passes MOT emissions requirements this should be sufficient. Some smaller would be unable to afford replacing the vehicle and increased maintenance costs

Newer cars are safer, more environmentally friendly and hopefully moving too Hybrid / full electric.

Companies will be having to fit the bill and after covid cannot afford

Most taxi drivers cant afford newer vehicles

We thought it was 3 Years anyway

The Taxi trade has taken a battering over the last two years due to the pandemic and enforcing this at this stage is another blow. Leave it to 5 years and then maybe rethink it again in 2025?

Its pass m.o.t.so it can be used on road

the best diesel immisions are from euro 6 vehicles they came out for the most part in 2015 and have not been improved on since , there is not a euro 7 for example,.

As a small taxi company in a rural area we can not afford to up date all our vehicles at short notice it would cost £100k + .We have just got back to working again after covid many firms had to take loans to cover them selves even the Government bounce back loans need to be paid back and are not as cheep as was told. In normal times I would replace a car every year but because of covid this did not happen. This will be an issue with many rural companies. In any cars most diesel cars became ulez compliant after 2015 so the pollution issue does not mean we cant run 5 yr old vehicles... I think you just need to add the emissions test at mot and again at the 6 month check to confirm all is well. I personally would not wish to drive a £20k car in rural Devon lanes where the hedge touches both sides of the car at once grass in the centre of it and tractors flying around every bend yet that is what we do all the time . Of course the larger companies in Barnstaple will love this because it will get rid of competition companies will fail and close down or at least reduce the size of the fleet as i will have to

that means people will no longer have a job without commuting adding more pollutants. The town taxi cartels will not take someone shopping or for an appointment if they live in Lee Bay of Woolhanger or the many other outlying areas that we the rural taxis cover and who suffers the customer the old and the vulnerable who need our services. We do not have the infrastructure in place to go the green that the Government asks for Im sure I read somewhere that the council should put charge points on taxi ranks once electric cars are excepted as taxis are you going to do that we would not be able to work for 3 hrs without charging , how can we be expected to do that. to conclude Devon at the moment and the vehicles available do not make for good service to the people of Devon

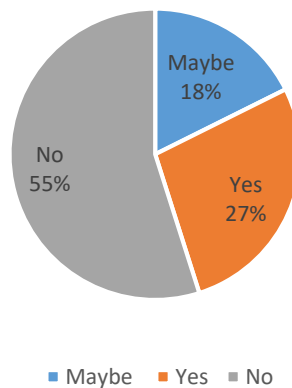
ANY DIESIL TAXI WILL MEET EURO 6, SO REDUCING THE MINIMUM AGE LIMIT TO THREE YEARS WILL MAKE NO IMPROVEMENT TO IMISSION QUALITY,BUT WILL INCREASE COSTS AT A TIME WHEN TAXI OWNERS ARE RECOVERING FROM A VERY LEAN PERIOD.

As a medical professional, i believe this is putting alot of pressure financially on people who are working over 60 hours a week to earn a living as many taxi companies do. You are targetting the one of the worst affected working force, who had to shut down all business during the pandemic and have not had chance to recover from this. Many are in debt due to the pandemic and your proposal will ensure they get into even more debt to buy new vehicles to come in line with your proposed policy. As a health care professional i am concerned how this will affect the mental wellbeing, as well as physical (working all the hours god sends to pay for everything) wellbeing.

### **Q3. Do you agree with the proposal to introduce an upper age limit for licenced vehicle renewal?**

Option	Responses
Maybe	9
Yes	14
No	28

Q3. Do you agree with the proposal to introduce an upper age limit for licenced vehicle renewal?



#### Q4. Comments to question 3.

24 comments were made.

No, as long as a vehicle is in good condition and passes the mot and taxi inspection then that should be enough.

I think even 10 years is far too long

Many owners take great care and constantly keep their vehicles in high quality condition and this should be taken into consideration

If the car is still in good condition and being serviced regularly what's the issue

As same answer to q1

Vehicle inspected are done very restrictively every 6 months once vehicle becomes 5 Years old . If a vehcile manages to get to 10 years old then it has been very well looked after being approx 300,0000 Miles on the clocks

Again, grossly unfair when vehicles are kept in tip top condition, pass all tests etc why should they be refused. Seems like restriction of trade. Torridge, I believe have no age limits at all!

I maintain my vehicles implicitly and they are older vehicles, why should I be penalised and discriminated against for choosing to look after my older vehicle.

as covered in previous comments .

Yes there are a lot of vehicles that are over the present age limit. They are inspected twice a year and have to pass emissions test at the time of an mot. With all the money and staff that has been lost during the pandemic and still not have recovered from this, and now with the price of fuel and energy prices rising all the time, it is not really the time to bring this in. I feel this would put a lot of taxi companies at the point of closing. Maybe it could be put back for another year to give the taxi trade time to recover .

This just seems to be picking on the poorest traders, if it passes the mot and taxi test it should be fine  
Upper limit yes but 11 years isn't old for a well-maintained car.

n/a

More costs for companies, could lead to losing lots of companies that cannot afford to upgrade vehicles

You make older vehicles have 2 tests a year

We only use our Taxi`s as we were instructed to keep our DCC School contracts with 8 seats or less we had to get them Taxi plated

The standard of vehicles nowadays is far superior then what they used to be! An upper age limit of 15 would be suitable and stick with the Council Inspection which should be twice a year from 8 years old!

I think it is fine the way it is

It pass test who knows what is what

Are you offering help to the companies who have older vehicles, I suspect not if they are looked after and serviced they can run as clean as a new car

As before if this is brought in then some companies will not be able to afford the replacements and so its the customer who suffers again taking away the competition from the bigger companies so they can take it all but only what they wish to not the depths of Exmoor or other rural areas. If this is bought in it needs to be done slowly over a number of years to give companies a chance to carry on working.

AFTER A VERY LEAN 2 YEARS NOW IS NOT THE TIME TO INTRODUCE THIS LIMIT

In my profession as a community health care professional, i drive around the rural country lanes in my car and i would absolutely not want to drive round these roads in a brand new car as it causes body damage, under side damage and puts more wear and tear on the vehicle.

Where's the money going to come from for rural seasonal taxi drivers after not working for two years

#### Q5. Do you agree with the proposal to introduce alternative vehicle standards for wheelchair accessible and ultra-low/ zero emission vehicles?

Option	Responses
Maybe	9
Yes	14
No	28

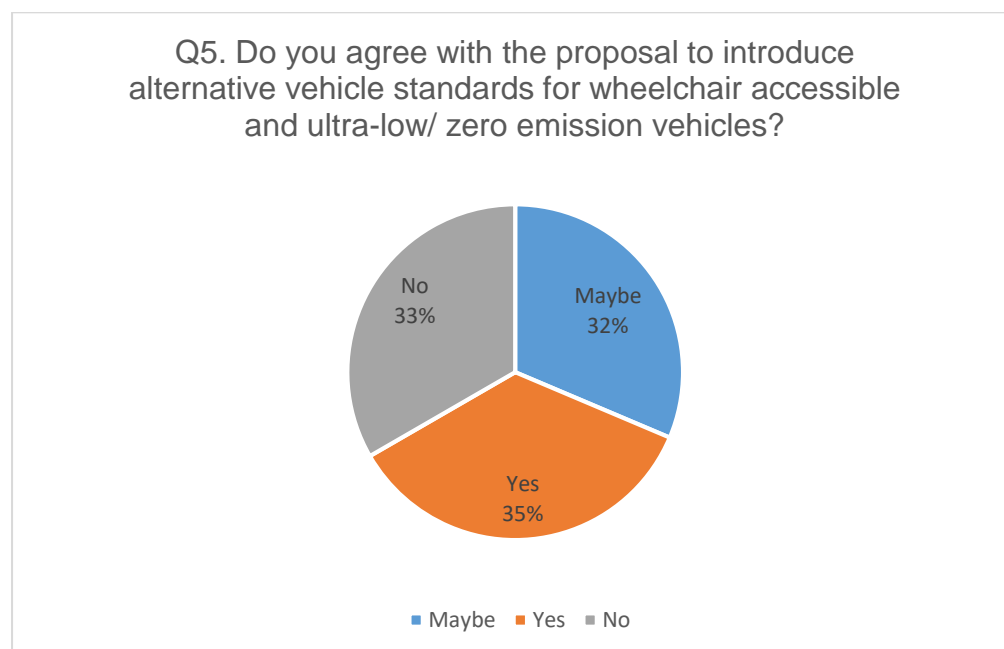


Figure 1question 5 of the survey

#### Q6. Comments to question 5.

17 comments were made.

see previous answer

If the council want to put out grants to help us taxi drivers to upgrade our vehicles that should be considered

This is without doubt a double standard that is pushing someone's agenda. It is not fair

Why are these vehicles any different from any other taxi, just because they maybe adapted!

all vehicles regardless of use should be treated the same

and to increase the number of WAVs available as many wheelchair users struggle to find suitable transport options.

Should be able to up to 10years, due to the price of these vehicles. Again seems to be an attack on the poorest traders

Why not if the journeys are local. Wouldn't want to go far in one though.

Agree with reason for accessibility not sure about why it would be applied to low emission?

More costs for smaller independent companies and sole traders

Although we do not have a Taxi with wheelchair access we do have a PCV Minibus with wheelchair access

for zero emissions i think even more of a relative incentive would suit.

I agree in principle but again I would say with the standard of these vehicles these days the twice yearly inspection should be extended to 10 years

you ask about low emission cars but we do not have the charging capacity in the area, Devon on the whole is rural and very hilly you will know this a friend of mine has an electric car and because of the limited mileage has to be aware of % of usage she lives in Lee cross to travel from her home to Woolacombe and back she uses 12% of her charge a distance of 4 miles but means going up the hill out of Woolacombe, she uses the same amount to Barnstaple and back 22 miles . Until a more suitable fuel package comes along when driving in north Devon Diesel is the most economic and efficient way to drive

I have always said that all companies with multiple vehicles should have one wheelchair accessible car for every six or seven of the total fleet . We do not have the infrastructure for zero emission cars

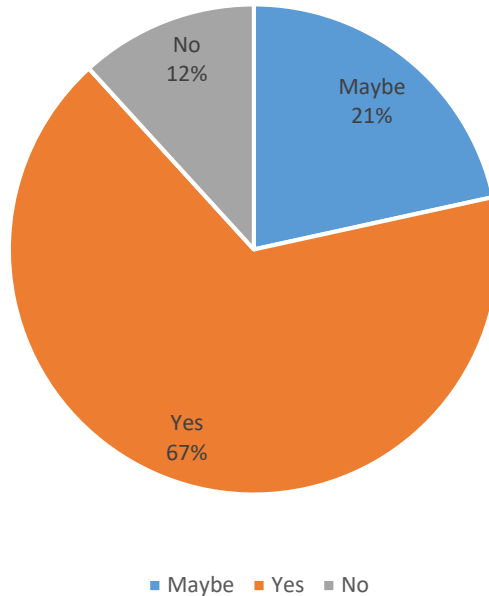
In north Devon there are definitely not enough wheel chair accessible vehicles however, low emission vehicles, i.e electric vehicles, there are no means to charge electric cars in rural locations. Not only this but most taxi drivers are not rich people, they live in terrace houses or blocks of flats with no designated parking and no means to facilitate a charging point.

Old used Taxi's will still be on the road as they will be sold off making no change in fact adding another car to the road

## **Q7. Do you agree with the proposal for the Council to become members of the National Register and to review all applications for new licences against it?**

Option	Responses
Maybe	11
Yes	34
No	6

**Q7. Do you agree with the proposal for the Council to become members of the National Register and to review all applications for new licences against it?**



**Q8. Comments to question 7.**

10 comments were made.

If as a new driver you have nothing to hide then this will make no difference to a driver.

Temporary suspensions should not be added unless a breach is proven

Good idea in principle.

Public safety

Yes if this would show you drivers that have been refused a licence in other areas

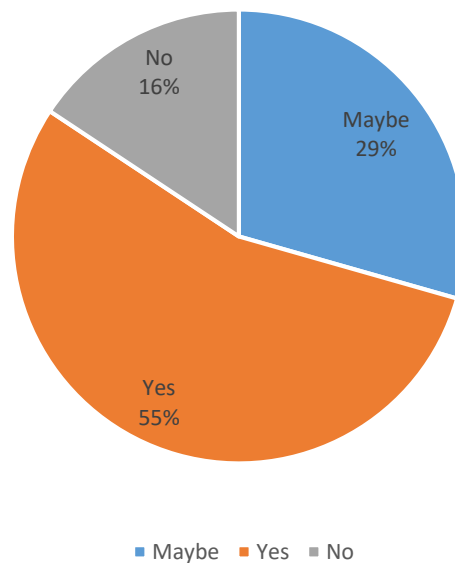
You already do the highest checks you will be wasting more money.

whatever keeps the public safe

**Q9. Do you agree with the proposed procedure for vehicle write-offs?**

Option	Responses
Maybe	15
Yes	28
No	8

Q9. Do you agree with the proposed procedure for vehicle write-offs?



#### Q10. Comments to question 9

9 comments were made.

Depends on individual circumstances

Any vehicle that is ( Written off ) shouldnt be licenced regardless of damage

This seems reasonable

A lot of write offs are unrecorded, can you guarantee a taxi won't be one?

Insurance write offs are an industry scam.

Do you mean the same reports as are now used for cat N and D if so thats fine but there are not many qualified people in the area to do them

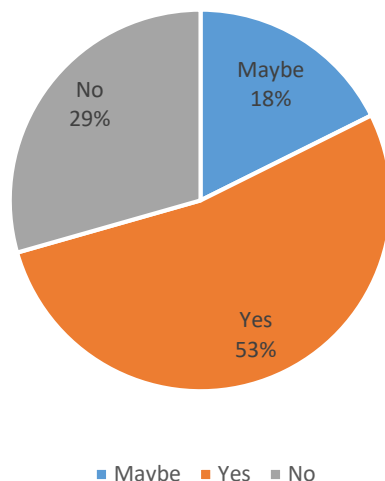
As long as they are checked by a registered vehicle engineer who specialises in this

#### Q11. Do you agree with the proposal to introduce daily safety/ roadworthiness checks for Licenced vehicles?

Option	Responses
Maybe	9
Yes	27
No	15



Q11. Do you agree with the proposal to introduce daily safety/ roadworthiness checks for Licenced vehicles?



## Q12. Comments to question 11

26 comments were made.

It's down to the Licenced driver to already perform these checks. way too much paperwork for the council and what's to say people won't fabricate the answers anyway. Terrible idea.

I am ambulance crew. We have to check our vehicles every day

The licencing officers used to carry out spot checks on vehicles. This should be reinstated not passed to the vehicle owner.

Each drivers should be doing these checks each day as part of their job

We personally already implement this routine for defect notifications

We do this anyway or at least I do, don't see it being needed and really not environmentally friendly paper wise

Contentious, professional owners / drivers will be ensuring vehicles are fit for purpose already. Those that don't... Still won't. But all of us will have an additional burden placed on our time. Not fair

Coming from a HGV background I agree with this

Why do we pay for an mot, why do we pay the additional taxi check list, this seems like another unnecessary check, why don't you just take over the taxi company and rent out your own cabs and do your own checks, it seems you want to run it like a council bus service

Weekly OK, daily too excessive

This should be common sense and understanding to keep log of any defects etc to be sorted

Drivers should be doing this anyways, enforcement would cost more than its worth

why not?

Will the council be paying for the extra time for drivers to do these checks if hired only to do council school transport

Should be doing this anyway

We do this anyway as part of our PCV Operators licence

excellent idea and welcome clarity for drivers.

But only basics on a daily basis like tyres, oil, lights, windscreen wipers and wash. The operator should be keeping a closer eye on a weekly basis

A driver should do this anyway

As a driver these basic things should be done every day but what happens when a driver maybe swaps from one car to another or swaps drivers ,I think you could give a little trust to people who are professional drivers after all and do this for a living

My fleet is checked daily any fault reported to me and action taken if there are vehicles on the road that should not be you should sort it out with those owners and drivers not give the rest of us more paperwork for something we already do

DRIVER S CARRY OUT THESE VEHICLE CHECKS & RECORDING THESE DETAILS IS TIME CONSUMING & NOT NECESSARY. AS I MAY BE DRIVING AS MANY AS 3 DIFFERENT VEHICLES IN A DAY THIS WOULD ALSO BE VERY TIME CONSUMING

However, you'd expect this to already be happening by the drivers since they should be prioritising public safety, a document to prove this is only going to give people a bigger work load. It would also be very hard to enforce.

All our cars are checked daily there's no need to cause paperwork that has to be admind and stored

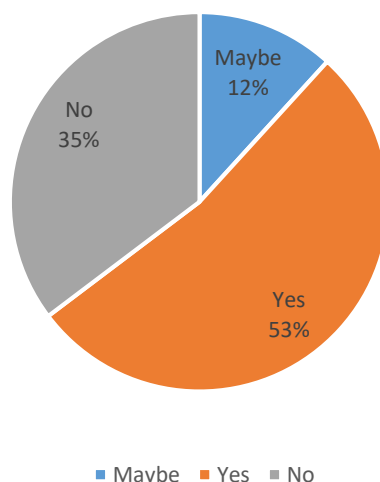
That's done on a daily basis anyway

As long as regularly enforced by Licensing

### Q13. Do you agree with the proposal to introduce record keeping requirements for Hackney carriage proprietors?

Option	Responses
Maybe	6
Yes	27
No	18

Q13. Do you agree with the proposal to introduce record keeping requirements for Hackney carriage proprietors?



### Q14. Comments to question 13.

18 comments were made.

You will lose drivers from too much paperwork and hoops to jump through. The independent drivers will mostly quit, because of low tariffs and small returns at the moment anyway. Only the Big companies will be left and that will reduce competition within North Devon.

They need to be kept accountable

I thought this would be normal practice

Unnecessary

What is the data protection implication of this by keeping data? This worries me!

This would be as previously mentioned common sense to keep up to date with vehicle maintenance

A responsible business should already do this

Don't know why this hasn't happened already.

n/a

Just concerned that I drive taxi connection for Lynton school and connection from Brendon to to Filers bus for Ilfracombe. I'm happy to do checks. But my taxi is kept with me and driven by me, although owned By Webbers. I think that item 1 on the list is over the top when I only use the bus on a split shift for 3hrs a day. the vehicle is very rarely used for any other purpose

We do this but is not recorded all in one book, each of our vehicle has its own Vehicle maintenance book and we have another folder with all our driver details and then we have a duty folder that records all the vehicle and who is driving them have maintenance

Great idea, safety is paramount, all drivers should be thoroughly checked and any sub contracted self-employed drivers within a taxi company should be assessed by council and taxi company directors

At what cost to who

I think owners of vehicles do this already all employees keep such records anyway as for vehicles after doing all this paperwork every day when can they get out and drive me to work again not needed where is the trust in people

I do not think this is anywhere near reasonably necessary we can all give you receipts for work done but you are again trying to pass the buck to drivers and companies who work diligently more testing by yourselves would be more appropriate how are we to have time to work with all the paper work to fill in. Think about it driver fills his daily check form in, a tyre is getting near the 2mm mark he informs me he then uses another car and fills another form in I then check for myself fill in a form go to garage and replace tyre fill in a form go home and collate all this together half a day gone for a tyre makes no sense and where do we store all this paperwork can we send it to the council once a week or month i fill a form i take it to garage g

THIS LEVEL OF RECORD KEEPING WOULD CREATE VAST AMMOUNTS OF PAPERWORK & STORAGE & AGAIN WOULD BE VERY TIME CONSUMING

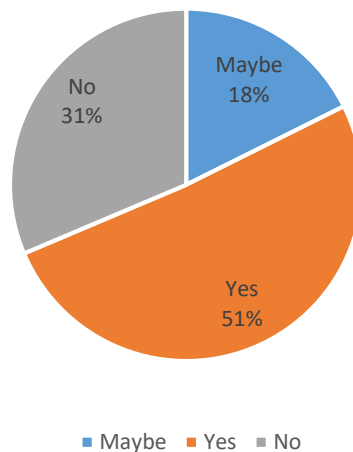
More pressure on people that are already over worked and under paid, stress levels are a concern and should be a priority of the council to ensure worker wellbeing.

Cost to much time and admin and we are not storing paperwork when there's no need for time consuming paperwork

#### **Q15. Do you agree with the above proposal to replace sun strips with “Private Hire Advance Booking Only” stickers?**

Option	Responses
Maybe	9
Yes	26
No	16

Q15. Do you agree with the above proposal to replace sun strips with “Private Hire Advance Booking Only” stickers?



## 16. Comments to question 15.

12 comments were made.

this would make it impossible to flag down a taxi is you were - say- stuck waiting for a bus that wasn't coming.

Additional stickers are not required in view

As long as they to placed in the same position on all vehicles

front sunstrips are already fit for purpose

The strip is outdated

n/a

Only just used for devon county council school runs

can't see any point in removing strips that are already on there. but happy with the stickers if the council are providing them, but will the stickers say which company the vehicle belongs to?

We only use out Taxis for School Contracts, we are not a Taxi Business who can ring up for a Taxi

For Private Hire operators who already have the sun strips then they should be allowed to keep them because removal maybe at a cost? For operators like Driving Miss Daisy Barnstaple we already have our Daisy logos and information on the sides of our vehicles so this would be compromised!

more added cost to council and damage to paint when removed easy to remove from glass

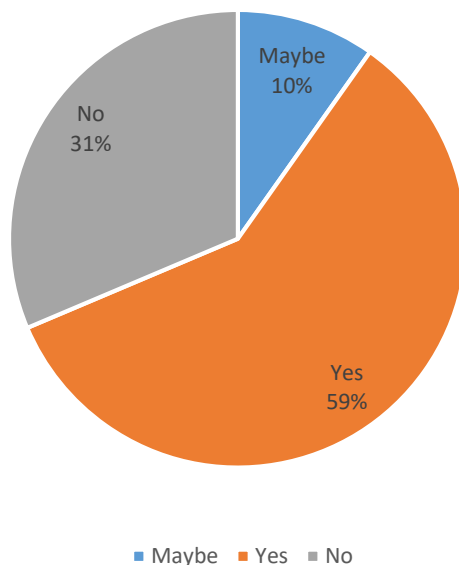
adds more costs for the owner and may damage paintwork also people are used to seeing the screen strip and might make it easier for none badges drivers to pick up

## 17. Do you agree with the proposal to introduce record keeping requirements for private hire vehicle proprietors?

Option	Responses
Maybe	5

Yes	30
No	16

17. Do you agree with the proposal to introduce record keeping requirements for private hire vehicle proprietors?



#### Q18. Comments to question 17

10 comments were made.

Why should they be exempt

Unnecessary

Same as Hackney no!

n/a

I'm only a driver so n/a to me

Same comment as for Hackney Carriage proprietors applies

Private hire maybe parked up three/four days so who fill this in

Im sure they do it already

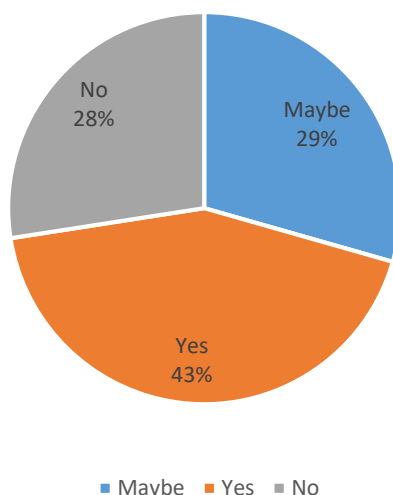
for the same reasons

Too much pressure on people already

#### 19. Do you agree with the proposal to make it a licence condition for drivers to attend an interview upon written request by the Licensing Authority?

Option	Responses
Maybe	15
Yes	22

19. Do you agree with the proposal to make it a licence condition for drivers to attend an interview upon written request by the Licensing Authority?



## Q20. Comments to question 19.

16 Comments were made.

Terrible Idea, Can be done over the phone. Shocking idea, will a police officer be present?? how do drivers complain about passengers?

I feel this would be open to abuse and would eventually cause drivers to leave the profession all together and would cause extra work load to the already strained licensing authority.

Depends who would be conducting these interviews

Depending on the serverity of complaint i would agree to certain degree as some complaint could even been seen as malicious themselfs

This could be used maliciously by competitors

Depends on the severity but if a council can issue a licence it can take it away

Depends on the severity and/or history. WAsTe of time if someones just having a whinge.

as long as it is a valid compliant

This would not apply to us as we are not a Taxi Business

yes because this will help us to better understand and address complaints as well.

At the earliest opportunity but maybe offer the option of three possible dates?

Investigate pull the driver in after investigation. Some one can complain just too be spiteful to the driver

an informal interview should take place first then you should say if its to go further and the driver can then take a solisitor to interview where you can then record the conversation under oath

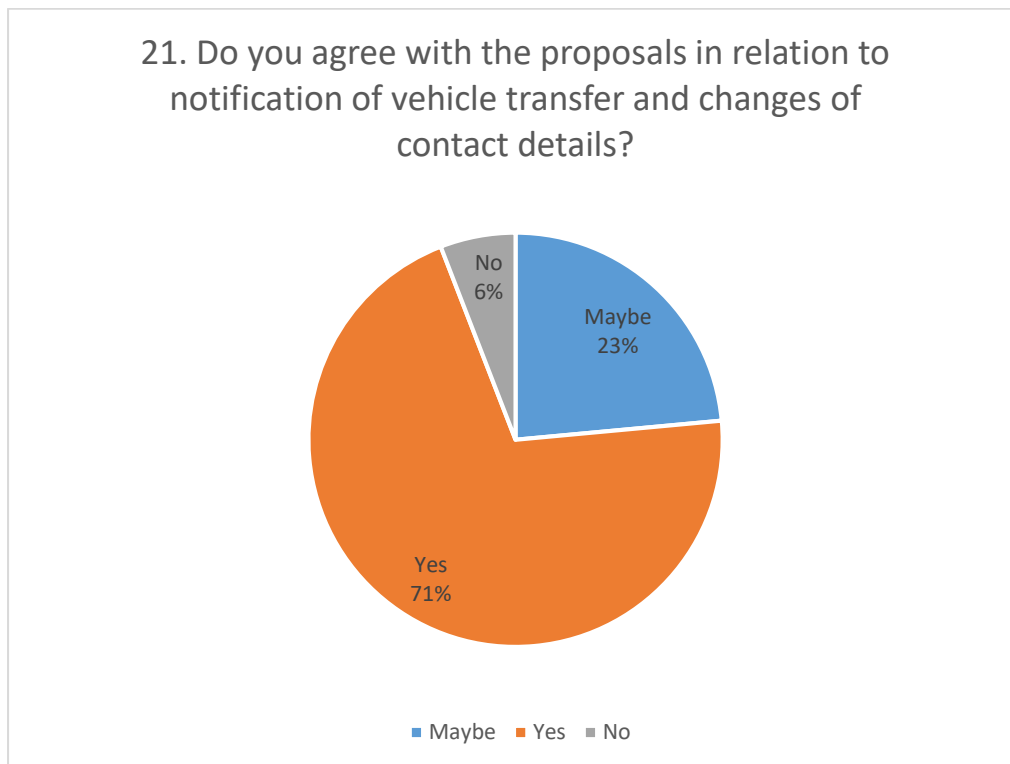
I think that to have a driver in and being able to record a statement should only be done by the police and a solicitor is present if yo wish to ask questions then do so if you wish to take it further then the driver should be allowed his civil rights and you maybe falling short of the law

Why would they need to?

Video calls can be used for this purpose saving time and stress

## 21. Do you agree with the proposals in relation to notification of vehicle transfer and changes of contact details?

Option	Responses
Maybe	12
Yes	36
No	3



## Q22. Comments on question 21

10 comments were made.

Shorley this is a no brainer

How is this different from now?

i thought this was required any way

Licencing office staff are already impossible to reach

n/a

I'm not a proprietor, so this question is n/a to myself

This is also a great idea, especially if car being loaned out has been reclassified by DVLA

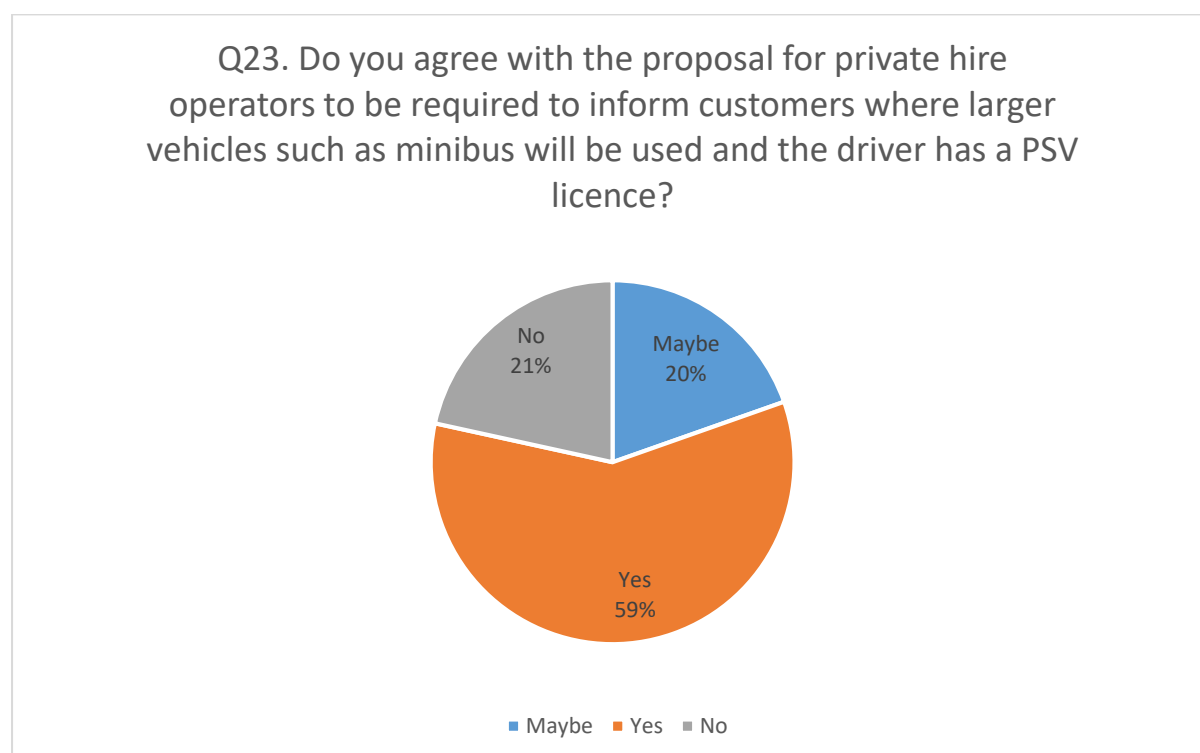
Surely thats already in place

thought we already did this

I would assume this already happens?

**Q23. Do you agree with the proposal for private hire operators to be required to inform customers where larger vehicles such as minibus will be used and the driver has a PSV licence?**

Option	Responses
Maybe	10
Yes	30
No	11



**Q24. Comments on question 23.**

10 comments were made.

can't understand the relevance.

This just does not happen

Reasonable

All psv drivers should have dbs anyway

maybe PSV drivers should also be required to have enhanced DBS checks if they carry passengers on any journey

ALL our drivers ARE DBS checked to the enhanced level SO THIS IS NOT TRUE

These days the PSV checks should definitely include the DBS check and why don't they?

DBS checks should always be carried out in all hackney carriage drivers

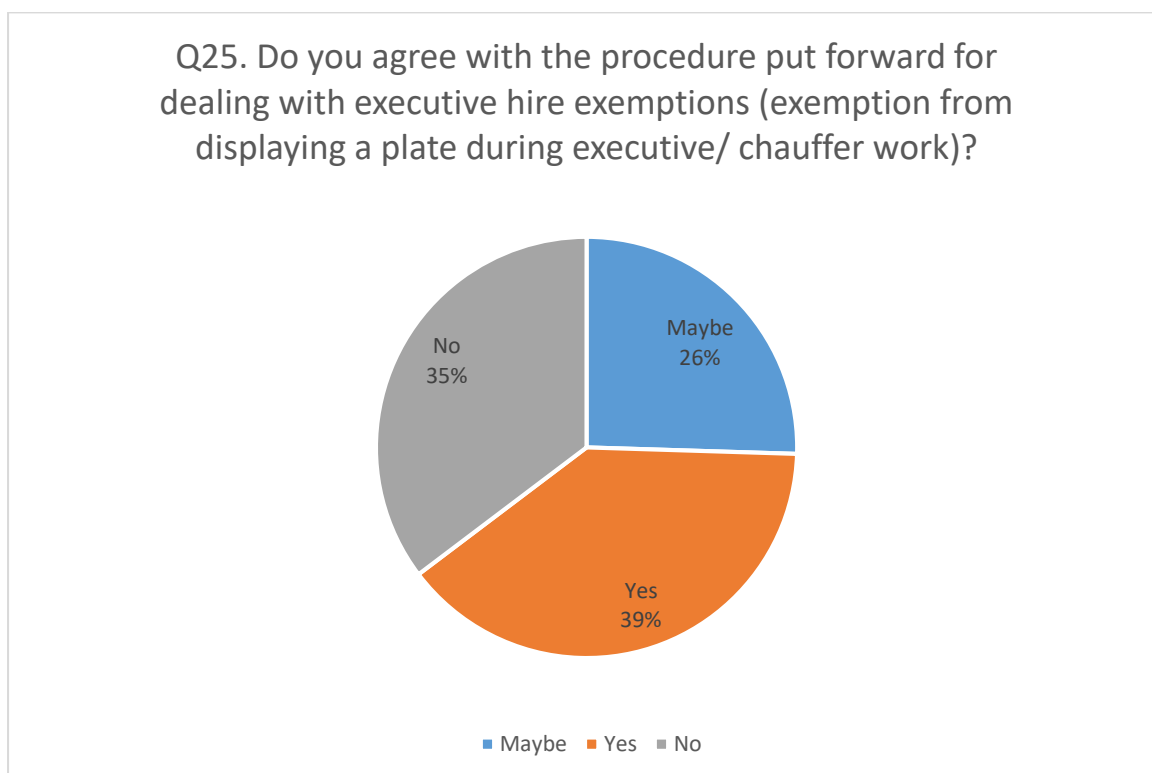
why ...a notice in the vehicle would suffice

why not just have a sticker on the bus



**Q25. Do you agree with the procedure put forward for dealing with executive hire exemptions (exemption from displaying a plate during executive/ chauffer work)?**

Option	Responses
Maybe	13
Yes	20
No	18



**Q26. Comments to question 25.**

9 Comments were made.

should apply to both hackney and private hire or none at all.

As long as they are working within the remits of there licence surely this is enough

A plate should be displayed

I believe all licensed vehicle should be badged as to show that they are a licensed vehicle

i would propose that driver is required to carry with but not display , some clients prefer a covert source of travel

Is there a legal definition of ' executive/ chauffer work'; all seems a bit pointless if not.

N/A from me again

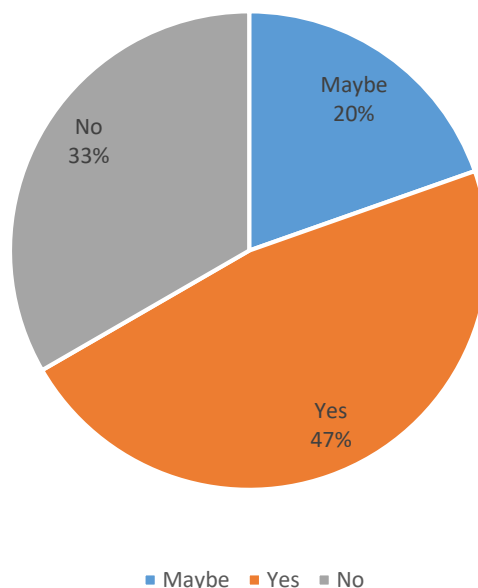
Yes these signs are not attractive

no point if you have stickers all over the side of the vehicle anyway

**Q 27. Do you agree with the proposal to introduce technical specifications and system requirements for newly installed CCTV systems?**

Option	Responses
Maybe	10
Yes	24
No	17

Q 27. Do you agree with the proposal to introduce technical specifications and system requirements for newly installed CCTV systems?



## Q28. Comments to question 27.

15 Comments were made.

There have to be standards

All well putting cctv in cars just remember whos paying

CCTV systems are not compulsory and therefore should be up to the operator to decide which device to install , Dashcam systems also act as a good prevention of crime, restricting the requirements of these camara system could potentially cause people to stop using them

The use of CCTV in a taxi may help drivers who are out in the early hours of the morning and help with their safety.

As long as the spec isn't financially prohibitive

Subject to vehicles stating there is CCTV, how long records kept and not misused,

More costs to companies after covid

I drive a school taxi and I'm not the owner of the vehicle. CCTV good in one way, it can protect drivers as well as passengers

Safety of drivers and passengers

i think this costs a large amount but other businesses have to do it as well. it should be mandatory for all taxis and ph vehicles and all systems newly installed or not. this will help to professionalise the service in north devon and hopefully encourage better behaviour from passengers eventually. Too many decent people are put off driving a taxi because of the lack of support when passengers

behave badly and dangerously, especially late at night. Taxi drivers should feel safe and respected at work.

Picture clarity should be based on HD cameras with anti dazzle

Cost to who and who can access this info

councils who have insisted on this are helping with payment to owners with a subsidy

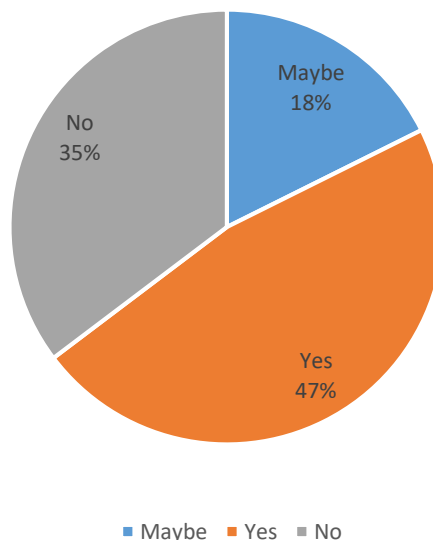
when this came about several years age councils were giving grants fot cctv will you

Dont agree with CCTV in vehicles that face customers, gone so long without them, we are in devon, generally quite safe and theyre costly. should be down to individual companies to decide, shouldnt be mandated.

**Q29. Do you agree that these technical specifications should only be applied to CCTV systems installed after 1st July 2022 as opposed to also applying to currently installed systems (thereby potentially requiring upgrade of existing systems)?**

Option	Responses
Maybe	9
Yes	24
No	18

Q29. Do you agree that these technical specifications should only be applied to CCTV systems installed after 1st July 2022 as opposed to also applying to currently installed systems (thereby potentially requiring upgrade of existing systems)?



**Q30. Comments to questions 29.**

4 comments were made.

Upgrades should be mandatory too.

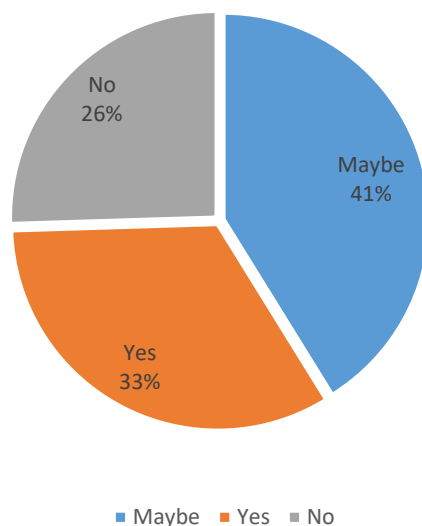
Cost

if in then why would they not be good enough most are just for external not internal. I had 2 fitted now disconnected . customers did not like them on the rank we were often walked past to other cars because we showed the cctv signs on the cars, once removed no walk byes  
as above

**Q31. Do you agree that the technical specifications are sufficiently detailed and give appropriate guidance?**

Option	Responses
Maybe	21
Yes	17
No	13

Q31. Do you agree that the technical specifications are sufficiently detailed and give appropriate guidance?



**Q32. Comments to question 31.**

9 comments were made.

test

These systems are not readily available. And I think restricting the requirements of these cameras will put people off using them at all

Doesn't go into any detail

Drivers should also take drug and alcohol testing, records should be maintained. This should include Council or police randomly carrying out checks

I can't see any tech specs to comment?

I think clear and simple guidance as to the responsibilities of the driver as a data controller and the role and responsibilities of the police service should be made clear in the specification if possible.

Who see this ?

How can people answer this unless they are knowledgeable on the subject .Are you stating you will be introducing mandatory cctv

**Consultation response received directly by the Licensing Team:**

With regards to consultation

HACKNEY CARRIAGE & PRIVATE HIRE.

I have one of the biggest fleets in North Devon my vehicles are all high quality consisting of BMWs/Mercedes and other makes. I have been in the Taxi industry for some 30+ years and have lots of experience in the Transport Industry.

I would like to start by saying we are as a country about to go into a recession with Electric & Gas prices soaring into thousands.

The price of second - hand cars also rocketing more than has ever seen before, this year a 5 year old car will cost on average £5,000 more than this time last year, keeping Taxi & Private Hire vehicles on the road is getting more expensive by the day. Tyres up by 30 per cent, Fuel every week up by 6/7p a litre. Wages now more expensive and getting people to join the trade as we know is harder than ever.

Some areas reporting a loss of 150/200 drivers due to the Pandemic.

The wait to get a course could be 3 months at a cost of £350 used to be a 4 day course now done in 1 morning session same cost though?? Cost of a licence NDDC went from £40 to over £100 not so long ago. Most people get fed up and get another job before the waiting is over. So altogether with medicals DBS checks, Driving Tests it is around £2,000.

We now also have to get a TAX no to prove you pay tax or registered but systems not working TAX help lines know nothing about this and give wrong info even after 5 hours on phone cannot be sorted!

1/ I do think we as a District have a good vehicle base throughout the sector and the 5 year rule is working fine. Some vehicles are in need of looking after better but this is a matter for the Enforcement team whom are rarely seen out on the streets checking vehicles.

If we move to 3 years it will push a lot of people out of the trade or make it financially unrealistic to earn a living and pay for a vehicle if you were involved in a collision, having to spend over £15,000 upwards to keep you on the road straight away would cripple some people and good people would be lost from the trade.

This would not get better cars out there or better looked after. I see Department of Transport are looking to move MOT for 2 years not one I think would be a good idea to keep ours as one.

Selling of vehicles in the trade should be looked at, maybe an age or mileage restriction when selling as a cab? Most only sell when they are tired and need to be replaced so a new driver then becomes an owner and potentially has a tired car which could be a problem.

I have and do sell me cars to others in the trade but only if in good condition ok mileage and are in my opinion reliable.

2/ I accept that vehicles should have an age where they should no longer be used as an Hackney Carriage as the public should expect a standard for the vehicle which is on a rank to be high, charge the same price at all times and not have drivers taking jobs off the rank by under cutting others, by law the meter should be used off the street at all times but I don't believe this should be the case for Private Hire. Age for plating a Private Hire Vehicle also should be removed as a customer should have the right to choose what he/she rides in when they are choosing by calling a company or person under Private Hire. Vehicles should be checked by a person who has the relevant qualifications before being plated.

3/ At the moment we do not have the in-fir structure for electric vehicles the area has hardly any charging points and I for one could not run my business as my cars do around 400 miles a day so would be charging more than on the road. I have looked at Hybrid same issue but better. All my cars are ULEZ what would you say is LOW EMISSION Vehicles?? Why is it different for Wheelchair Vehicles?? Why have different rules for these maybe we should wait another 5 years and look again when things have moved on and we can actually see the real price to charge and drive an Electric car.

4/ No Issues

5/ Safer not to licence at all do not see the reason to take a chance with peoples safety.

6/ I understand where you are coming from with this but will just be a box checking thing and more trees destroyed for no gain. Enforcement Officers on the road/ranks checking would be better and more effective. We have had 2 checks in past 4 years on the roads/ranks not really any good.

My vehicles are serviced regular and thing put in place for any break downs or service requirements. My drivers do check cars on a daily basis and each driver keeps his own car which helps, I understand some companies would find this a problem but the manager should check all cars regular. I would not believe anyone

could say there is a problem with any of my vehicles as I pride myself on having the best in the area!

7/ If vehicles are serviced regularly this should not be needed. I understand why employers need to know who is driving that is why each driver has own car in my company. I do not believe there is any law that states this must happen and its down to owner to look after his vehicles this is why you have conditions and fines if not done properly.

8/ Advanced Booking Only is good How Big Size???

9/ Private Hire should keep records of bookings anyway. I do not have a office for bookings do not have members of public calling in only from Agencies and Companies/Councils we work for.

10/ OK but any traffic violation should be dealt with by the Police as that is their job to many complaints are made out of malice and jealousy having a plate on the back makes us an easy target (I have proof of this if you need) to call the council when most of the time its tit for tat or they are in the wrong but will not admit to it. Easier to call council and get us in trouble!

Also some licensing managers are very biased! And even say" you wouldn't be called in if you were not guilty" not innocent till proven!!

11/ Always done straight away as soon as it happens!

12/ No Issue

13/ This should also include special vehicles the PROM in this country is getting bigger and more popular, vehicles are being used with no insurance and charging silly money!

I notice the vehicle is only allowed 3 seats plus driver I understand for small vehicles but mine is a Superior Quality and Mercedes state is more than capable of carrying 4 passengers plus driver so why should it be held back. I often carry 4 men to rugby with no complaints. Also would we be able to swap vehicles plated already to Executive Travel? As this is all I do nowadays.

14/ CCTV can cause so many issues people do not understand all the legislation surrounding it!!