

# North Devon Council Hackney Carriage and Private Hire Policy Amendments.

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

51 responses were received.

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

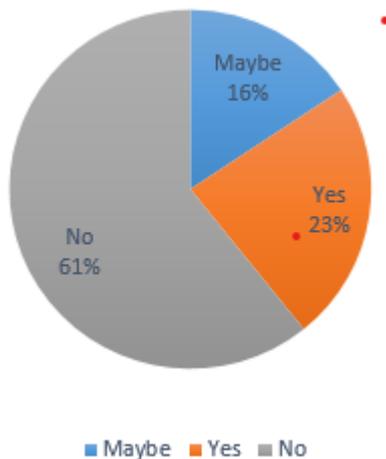
Option Responses

Maybe 8

Yes 12

No 31

**Q1. 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 up to 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 up to 5 years. This would just impose for those in the industry with limited funds (affected by covid 19) unable to upgrade or buy new vehicles in their price ranges

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

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

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 wouldn't make full electric an alternative this would require a lot of infrastructure expansion

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 emissions 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 DIESEL TAXI WILL MEET EURO 6, SO REDUCING THE MINIMUM AGE LIMIT TO THREE YEARS WILL MAKE NO IMPROVEMENT TO EMISSION 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 a lot of pressure financially on people who are working over 60 hours a week to earn a living as many taxi companies do. You are targeting 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.

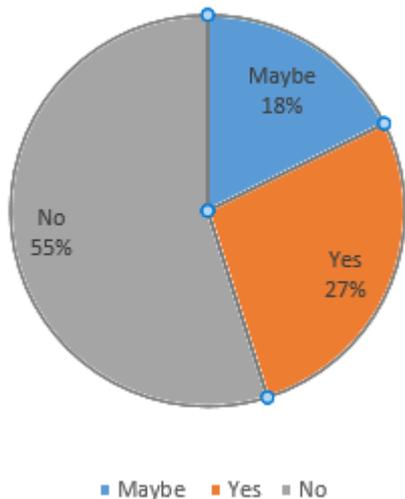
**Q3. Do you agree with the proposal to introduce an upper age limit for licenced vehicle renewal?**

Option Responses

Maybe 9

Yes 14

No 28



#### 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 vehicle 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 brought 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 rual seasonal taxi drivers after not working for two years

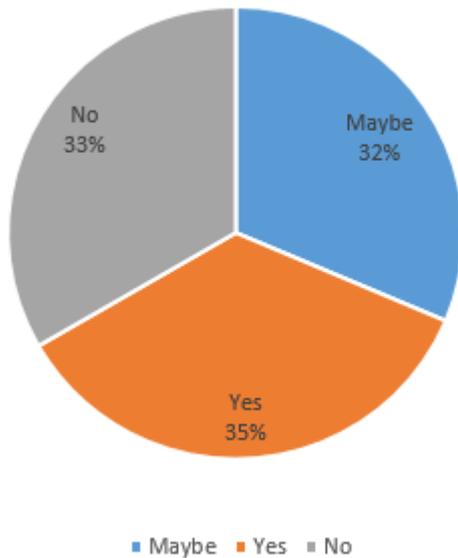
**Q5. Do you agree with the proposal to introduce alternative vehicle standards for wheelchair accessible and ultra-low/ zero emission vehicles?**

Option Responses

Maybe 9

Yes 14

No 28



**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

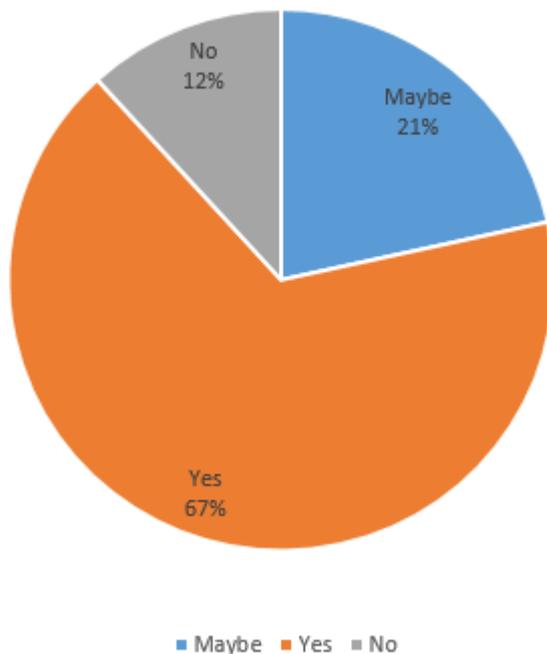
**Q7 Do you agree with the proposal for the council to become members of the National Register and to review all applications for new licences against it?**

Option Responses

Maybe 11

Yes 34

No 6



**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

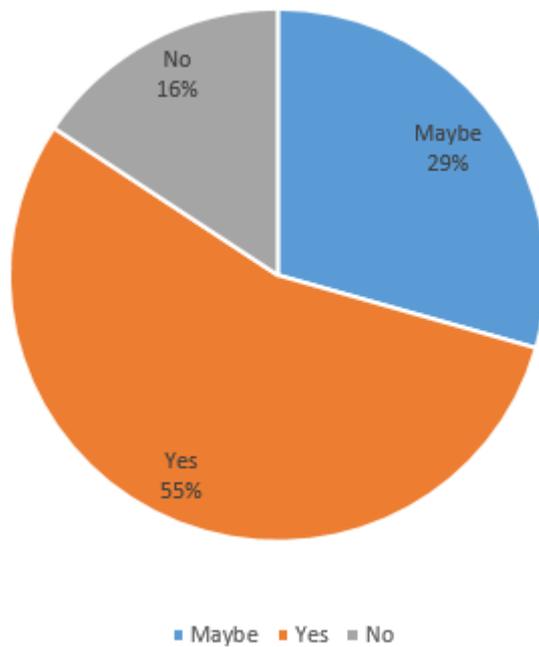
### Q9. Do you agree with the proposed procedure for vehicle write-offs?

Option Responses

Maybe 15

Yes 28

No 8



### Q10. Comments to question 9

9 comments were made.

Depends on individual circumstances

Any vehicle that is ( Written off ) shouldn't 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.

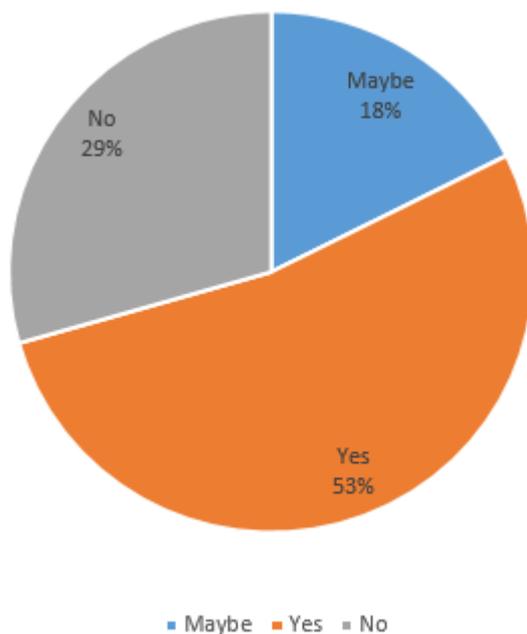
Do you mean the same reports as are now used for cat N and D if so thats fine but there are not many qualified people in the area to do them

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



### 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

DRIVERS 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 admined and stored

That's done on a daily basis anyway

As long as regularly enforced by Licensing

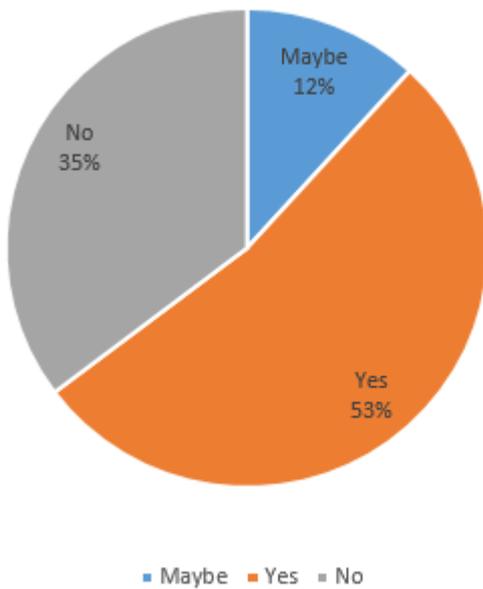
**Q13. Do you agree with the proposal to introduce record keeping requirements for Hackney carriage proprietors?**

Option Responses

Maybe 6

Yes 27

No 18



#### 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

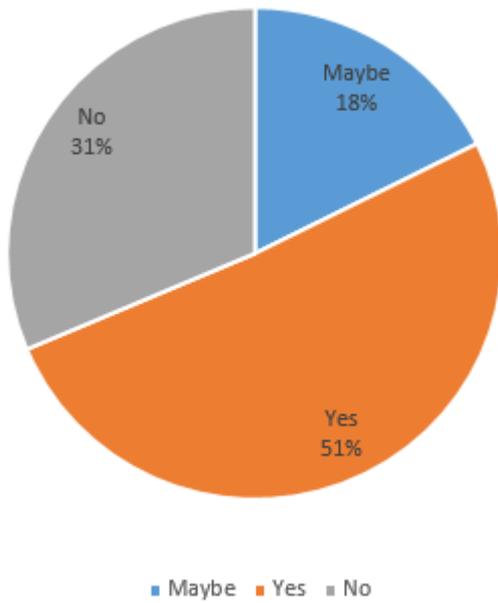
**Q15. Do you agree with the above proposal to replace sun strips with "Private Hire Advance Booking Only" stickers?**

Option Responses

Maybe 9

Yes 26

No 16



### 16. Comments to question 15.

12 comments were made.

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

Additional stickers are not required in view

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

front sun-strips 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!

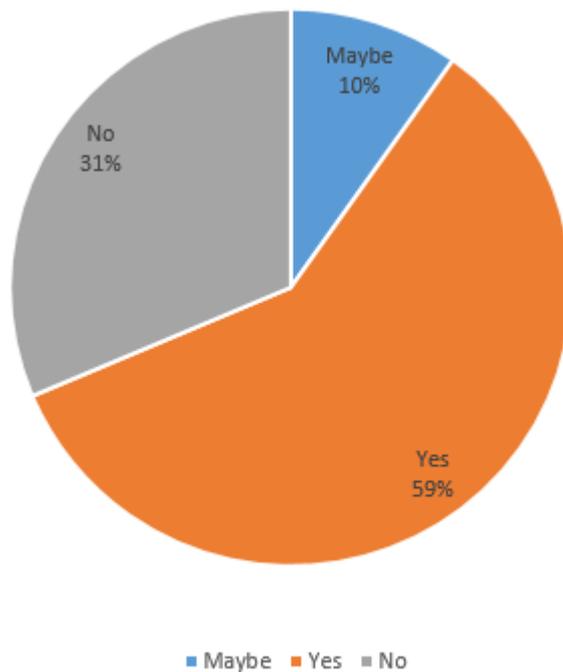
more added cost to council and damage to paint when removed easy to remove from glass

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 non badge 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



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

I'm sure they do it already

for the same reasons

Too much pressure on people already

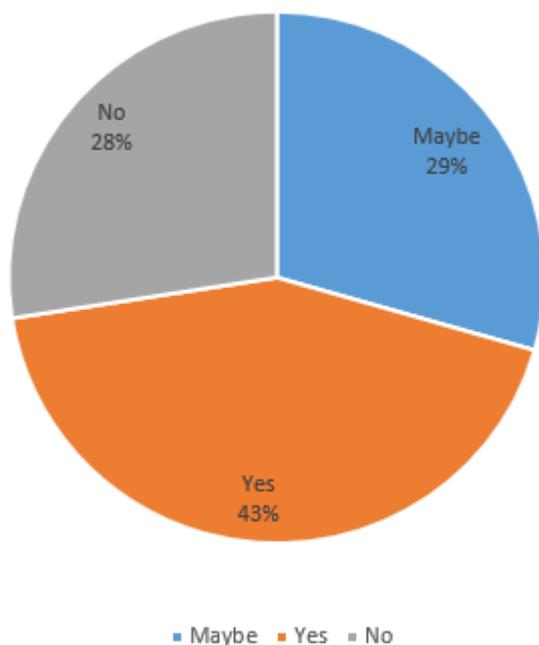
19. Do you agree with the proposal to make it a licence condition for drivers to attend an interview upon written request by the Licensing Authority?

Option Responses

Maybe 15

Yes 22

No 14



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 severity of complaint I would agree to certain degree as some complaint could even been seen as malicious themselves

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 someone's 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 solicitor 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 you 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 may be falling short of the law

Why would they need to?

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

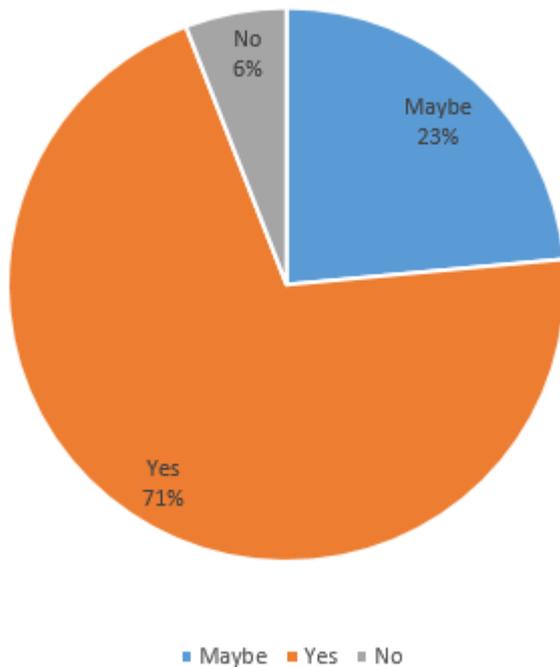
## 21. Do you agree with the proposals in relation to notification of vehicle transfer and changes of contact details?

### Option Responses

Maybe 12

Yes 36

No 3



**Q22. Comments on question 21**  
10 comments were made.

Surely this is a no brainer

How is this different from now?

I thought this was required any way

Licensing 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 re-classed by DVLA

Surely that's already in place

thought we already did this

I would assume this already happens?

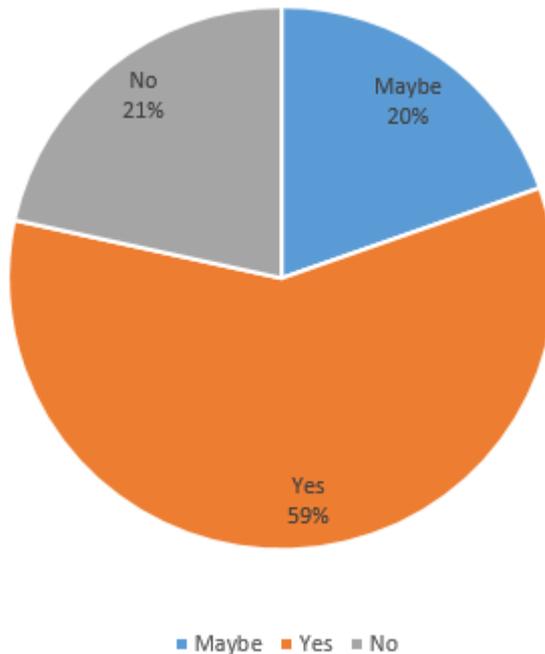
**Q23. Do you agree with the proposal for private hire operators to be required to inform customers where larger vehicles such as minibus will be used and the driver has a PSV licence?**

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

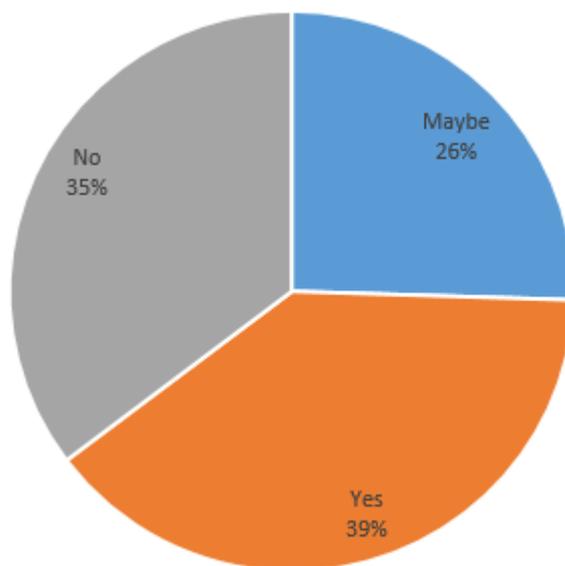
Q25. Do you agree with the procedure put forward for dealing with executive hire exemptions (exemption from displaying a plate during executive/ chauffer work)?

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

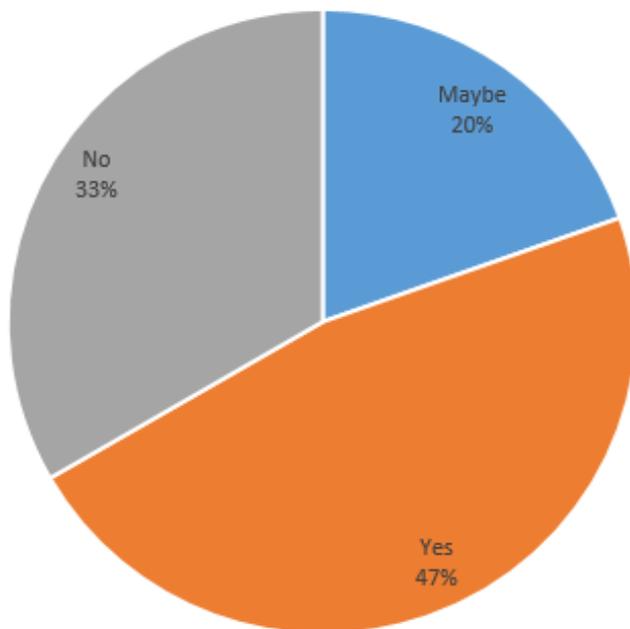
Q 27. Do you agree with the proposal to introduce technical specifications and system requirements for newly installed CCTV systems?

Option Responses

Maybe 10

Yes 24

No 17



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.

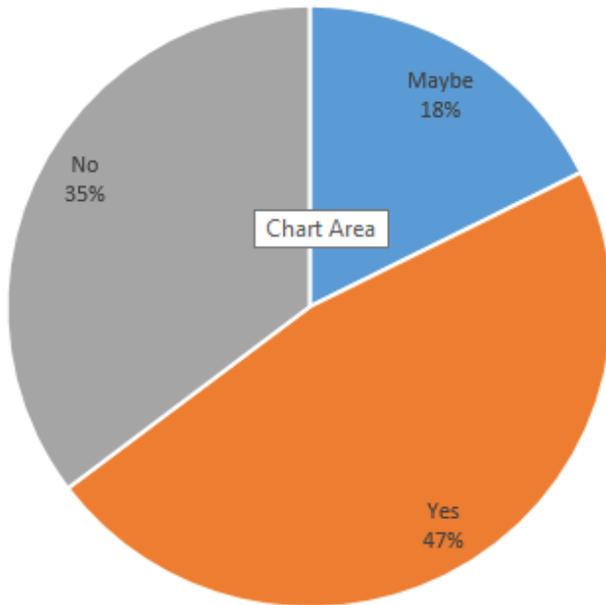
**Q29. Do you agree that these technical specifications should only be applied to CCTV systems installed after 1st July 2022 as opposed to also applying to currently installed systems (thereby potentially requiring upgrade of existing systems)?**

Option Responses

Maybe 9

Yes 24

No 18



**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

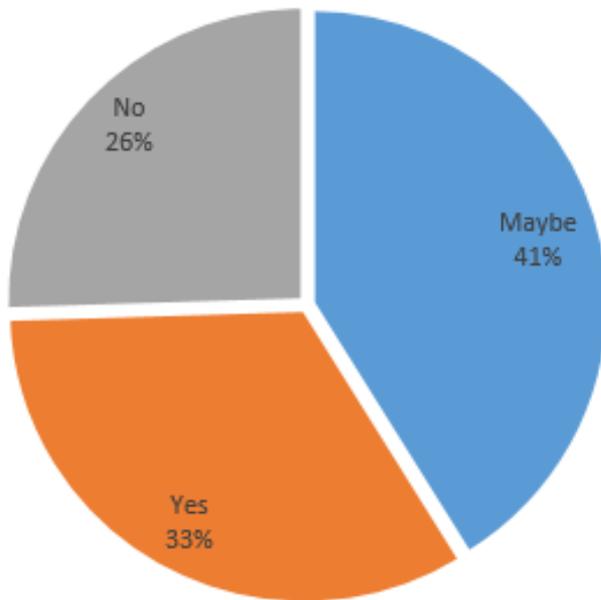
**Q31. Do you agree that the technical specifications are sufficiently detailed and give appropriate guidance?**

Option Responses

Maybe 21

Yes 17

No 13



### Q32. Comments to question 31.

9 comments were made.

Test it

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

Should not be made mandatory