



**North Norfolk
Taxi & Private Hire Association**
Website: NNTPHA.WEEBLY.COM



Review of proposed NNDC Handbook edition 4

North Norfolk Taxi & Private Hire Association have reviewed the proposed NNDC taxi handbook Edition 4 and listened to its members before compiling the following report.

The associations report highlights observations and suggested ammendments that allow the council to continue to put public safety at the forefront whilst not adding additional financial burden to an essential business sector of the community that has, along with others, suffered servere financial hardship during the pandemic with no signs of any recovery in the near future.

Many operators have seen all their long distance bookings canceled and with North Norfolk having a large population of elderl y people local operators have seen a drop in their daily trade as a high proportion of customers minimise how much they go out as they shiel d.

The association has expressed desire to enter into talks about the various changes.

It has expressed concerns over the timing of this consultation process and the apparent lack of empathy shown towards the tra de in its release, given that it has been many years in the making.

It also questions the number of responses these email consultations tend to receive.

It is strongly beleived that as this was only sent out by email there are people who haven't received the consultation, eithe r because they don't have computers or email addresses or email addresses held by the council are no longer current.

The association has had the same issues and tried to address them this year with its website and text messaging and its close d Facebook group which has seen a much greater success in getting information out than when we only used email.

The report has highlighted in Black and yellow in the left hand column the various sections that where not included on the fe edback forms, whilst the handbook was made available to read it would be fair to say that some may assume that the comments form includes a ll the changes, theres nothing to suggest it doesnt.

Unless you were very familiar with the current handook or spent time comparing them it would be hard to know what has changed .

The association has listed everything on the report it wishes to draw attention to and comment on and looks forward to being able to discuss the proposed changes further either face to face or via a zoom meeting.

The overall view is that, whilst it is accepted the current handbook needs updating, even if only for page numbers and bullet points, some changes will unnecessarily add to drivers and operators expenses and some sections are just adding rules which will increase the likelihood of people making errors, the more rules there are, the more there is to get wrong or forget.

There are sections that whilst the rule hasn't changed, it has been expanded on.

The proposed new handbook now covers 58 pages as opposed to the current edition only being 34 pages and appears to obmit the final page of the current addition covering the Procedure for Hackney Carriage Fare Increases.

The associations message if the council want people to know the handbook would be fewer pages, fewer rules.

Kind regards

Steve Heels
NNTPHA secretary
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NNTPHA feedback on draft taxi handbook

| | |
|-----------|--|
| page Nos | Section 1 |
| | Introduction only |
| | |
| | Section 2 |
| Pg 10- 13 | Application process |
| 2.1 | |
| 4 | (new form) to check DVLA driver details |
| | |
| 7 | Taxis drivers test past certificate (Not mentioned anywhere Else in Book) Also thrown out in 2012 |
| | |
| 9 | New Safeguarding Training |
| | NCC Badge holders have to do one will this be accepted ? (Will this be E learning video to watch on laptop) ? (How will it be enforced) ? |
| | |
| | Knowledge test |
| | The Trade supports this but would like to see it localised to the area the driver will be working. There would be 5 areas knowledge tests, Fakenham, Sheringham, Cromer, North Walsham & stalham, the driver would select an area upon application. The Association would like more details & costs & would like an input into the questions These could be set based on operator led questions from a given area. |
| | |
| 2.13/ | States medical to be done by A medical practioner |
| 7.1.2 | States YOUR medical practice (This change to the handbook would prevent getting the best price, IE(Mundesley were £80 Cromer are £127) |
| | |
| 2.13 | Also states medical every 5 years and annually after 65 years of age |
| | The medical was set at 6 yrs in 2012 as it ran in line with the 3 yr Lic renewals and 3 yr DBS The Association apposed making it 6 yrs for over 65s but was told it was descriminatory not to. This was also confirmed in a letter to Norman Lamb MP. Has the equalities Act changed ? |
| | |
| 2.15 | Knowledge test etc |
| | Current handbook states: Tests to assess applicants driving ability & in appropriate circumstances a knowledge of the area (bottom of pg 4 Edition 3) See comments in section 2 |
| | |
| 2.17 | Annual disclosure to NNDC of Drivers and vehicles |
| | The Trade does not support this and believes records should be kept and made available |

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| | on request as current rule, Licensing have a list of vehicles belonging to each company from renewals & current badged drivers. It just adds extra work load to operators, |
| 2.22 | Upto 1 month before expiry (Current handbook states applications should be in at least 3 week prior to renewal) That only leaves a 1 week window. Licensing need to reduce the turn around time in line with West Norfolk, which is 3 days. |
| 2.23 | No longer accepting scan docs/email application forms, except forwarded insurance docs from (Droconian/inconvenient/time consuming) Should be moving forward not backwards |
| 2.24 | Refunds will be given on applications refused not including tests/medicals/DBS etc Applications should be processed and granted subject to receiving the above except for DBS Association suggests an order of which things are done to minimise expense to applicant |
| 2.25 | An admin fee will be charge (define admin fees) This could be part of 2.24 |
| Pg 13 -24 | Section 3 Vehicles |
| 3.9 | 2 tests per year if vehicle over 5 years old The Trade wishes to make clear this will add costs to an operator. We propose that and MOT should be done in the 6th month after the taxi test This would mean ALL vehicles of All ages will have 2 tests per year thus increasing the safety standard, it would also mean there was no 2 month moratorium on 2nd test failures Some operators would need 2 MOTs in year 1 but would not incur extra costs from then on |
| 3.10 | Sub committee will consider vehicles over 10 years if in exceptional condition See stated case |
| 3.11 | Definition of exceptional ? |
| 3.14 | contradicts 6.4 (Executive vehicles falling under specialist vehicles) |
| 3.16/3.17 | Doors/exits on minibuses needs clarifying Operators concerned about existing vehicles that don't meet this criteria and also passengers not wanting to travel backwards for long journey's. Many minibuses except those designed specifically as taxis, have forward facing seats & are not moveable. |

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| | Emergency services have stated that they do not remove people through doors if they need to be extracted. |
| | |
| 3.24 | applies to above |
| | |
| 3.25 | additional details added for Hybrids and electric cars |
| | |
| 3.26 | Bullet point 1 (must be sufficient space for wheelchair to turn) |
| | This is only relevant to black cabs of which Nth Norfolk has none our WAVs are rear loading |
| | |
| | Lifts |
| 3.28 | Tested by approved person or contractor of the lift company |
| | (what happens if original company doesn't exist anymore) |
| | Should be worded as "an approved contractor" not his |
| | |
| 3.29 | (New) lifts and ramps |
| | Relevant to Black cabs only, Non in Nth Norfolk |
| | |
| 3.30 | (New) Ramps |
| | Could only apply to non fixed ramps and not those factory built vehicles with fixed ramps which in the main in Nth Norfolk are all rear loading. |
| | |
| 3.31 | (New) Lifts |
| | Email sent to Steve Hems on 15th July covering the concerns over this entire section |
| | |
| 3.32 | New |
| | |
| 3.33 | (New) Carriage of portable oxygen tanks |
| | |
| | Vehicle Testing |
| | |
| 3.34 | (New) Vehicles over 5 yrs old must have 6 monthly tests |
| | See 3.9 comments |
| | |
| 3.35 | Can licensing make this more widely publicised for operators as it isn't currently |
| | |
| 3.37 | Relates to above 3.34 |
| | However another option would be a mileage based inspection as this determines wear and tear more accurately |
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| 3.38 | relates to above |
| | Garages should be able to complete repairs if requested to do so, current spend limit is to low |
| | Appointed garages should also have a list of items that dont constitute a re test fee |
| | |
| 3.39 | Need definition of wording - reasonable is to ambiguous |
| | Consideration should be even to an operators diary where possible |
| | Though it is accepted that this is the wording used in the MPA 1976 sec 68 |
| | |
| | New section Altered vehicles |
| 3.40 | New detail |
| | |
| 3.41 | New detail |
| | |
| 3.42 | New Detail |
| | |
| 3.43 | New detail |
| | |
| 3.44 | (New detail) Cleanliness of vehicles before a taxi test |
| | |
| 3.46 | (updated requirement) must fill in NNDC form after accident |
| | This is a time consuming addition |
| | |
| 3.52 | Exception on above rule |
| | |
| 3.53 | |
| 1 | More detail on fire equipment |
| | Questionable/ just needs to specify which one NNDC require a taxi to have |
| | |
| 2 | More detail on first aid kits |
| | First aid kits are purchased as a pre packed item not individually chosen section should specify which Kit is required if this is necessary. |
| | |
| 3.57 | Covers CCTV |
| | Does this cover External dash cams that are currently and widely used |
| | |
| 3.63 | Applies to LPG |
| 3.64 | Applies to LPG |
| 3.65 | Applies to LPG |
| 3.66 | Applies to LPG |

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| | |
| 3.67 | Applies to Electric vehicles |
| 3.68 | Applies to Electric vehicles |
| 3.69 | Applies to Electric vehicles |
| | Insufficient incentive given high costs of purchasing such vehicles |
| | No where near enough charging points to be an effective alternative |
| | |
| 3.70 | New entry on tinted windows |
| | |
| 3.77 | (New) Advertising permitted on rear doors of vehicles subject to approval |
| | Whilst this is welcomed by the trade, restricting this to the rear doors is prohibative as many operators have there logos and phone numbers over these areas, therefore adding the rear |
| | quarter panels to the pre approved areas would be more beneficial. |
| | It appears that far to much detail is laid out in section 3.77. If the council have to approve |
| | everything first then why not just say each case will be approved on its own merit. |
| | |
| 3.78 | (New detail) Taxi plate must be readable from at least 5 metres |
| | Based on whos eyesight, suggest it is worded clean and visable at al times. |
| | |
| 3.83 | (New detail) lost and stolen plates |
| | who pays for a stolen plate ? |
| | |
| 3.84 | Existing rule |
| | Is this everyone, HC and PH operators inc employees |
| | |
| 3.86 | No Advertising on Trailers |
| | This rule prevents an operator from earning additional income. This should fall under 3.77 |
| | |
| 3.87 | New detail on trailers |
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| Pg 24 - 27 | Hackney Carriage vehicles |
| | |
| 4.1 | New introduction |
| | |
| 4.2 | New information |
| | |
| 4.5 | Appears to be new |
| | Taken from section 49 of MPA 1976 |

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| 4.13 | Need definition of wording - "reasonable" as to ambiguous |
| 4.14/4.15 | New wording |
| 4.17 | (New rule) All Taxi roof signs must be white and design approved by council This will cost operators who do not already have a sign that meets the new design & shape The council could alleviate this by offering a years free renewal where an operator had to replace the sign or could phase this in with new operators and where replacement roof signs where needed, but ordinarily they tend to last a long time. This would also make more sense if PH vehicles started having Yellow roof signs with PRE BOOKED ONLY on the colours would tie in with the ptaxi license plate. |
| 4.19 | (New rule) Taxi roof sign must be readable from 20 metres away This means the word 'TAXI' should be the same size as a number plate letter (50mm wide x 79 high) stating the measurements in the handbook would be clearer. |
| | vehicle inspections |
| 4.20 | (new rule) covers 6 monthly tests |
| 4.21 | (new rule) covers 6 monthly tests |
| 4.22 | (New detail) on periodic vehicle inspections 2 months grace to get repairs done See section 3.9 |
| | Section 5 |
| | private Hire vehicles |
| 5.2 & 4.5 | New insertion taken from Misc provisions act 1976 section 49.1 |
| | Vehicle signage |
| 5.4 | Private hire vehicles must have NNDC door signs stating Pre booked only Not compatible with expensive vehicles, also discolours paintwork. Many PH vehicles are also used as private cars. Yellow roof signs could be allowed stating 'Pre Booked only' if requested but would have to have door magnets to use Norwich bus lanes, but not sign written |
| 5.5 | relevant to above Unreasonable for executive PH vehicles that specialise in long distance hire Also involves additional expense |

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| Pg 28 - 30 | Section 6 |
| | Special event Vehicles |
| | All new category |
| Pg 30 - 36 | General requirements |
| 7.0 | Combined Hackney and PH drivers lic |
| 7.1 | Edition 3 states minimum of three years New rule states 12 months |
| 7.1.2 | Changed from ANY Drs to YOUR medical practice Financially disadvantages drivers |
| 7.1.3 | Authorise NNDC to check your driving history with DVLA DBS checks All new DBS applications should be encouraged to sign up to the electronic update service in line with 6.2 of the New statutory guidance of July 2020 |
| 7.3 | States medical every 5 years and annually after 65 years of age states by a medical practitioner but then refers to Your Dr. Contradicts 7.1.2 Attention is drawn to the response at 2.13 |
| 7.14 | Must notify council if PH driver changes operator they're working for within 7 days |
| 7.21 | New detailed wording for new applications |
| 7.22 | If a license is revoked you can't reapply for 1 year This is not appropriate, as new evidence can come to light which could facilitate a new application as an avenue to avoid costly court appeals and this rule would not be in line with the new statutory guidance 9.8 & 9.9 |
| 7.23 | New rule provide copy of driving license annually Council given authority to check DVLA licenses periodically under 7.1.3 |
| 7.27 & 9.15 | Updated details on how to deal with a body |
| 7.28 | cover seat belt rules Clarity and discussion required for all operators especially where contracts are carried out |

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| 7.31 /7.32 | Procedue for finding lost property has changed Call 101 get report number take to police within |
| 9.16/9.17 | 72 hrs increase from 24 |
| | Experience of calling 101 is of poor response/unanswered and time consuming. |
| | Existing rules are adequate with addition of (if not claimed by or on behalf of its owner) |
| | |
| 7.34 | Rule change to must put animals in rear of car unless specialist dogs |
| | 2012 handbook left to descretion of driver & should remain |
| | |
| 7.40 | (New rule) Must notify NNDC if NCC badge revoked |
| | |
| 7.41 | Covers smoking & E cigs |
| | |
| 7.42 | Failure to provide |
| | |
| 7.43 | Must take watch safeguarding video |
| 2.1.9 | Response in 2.1.9 |
| | |
| 7.44 | both sections cover equalities act |
| 7.45 | |
| | 165 of the Act only applies where a council has implemented section 167. Unaware that NNDC have |
| | |
| 7.46 | refers to 7.41 but is incorrect as this covers smoking |
| | |
| | |
| Pg 37 - 39 | PH Operators |
| 8 | General requirements |
| | |
| 8.1 | Contravenes Misc prov act 1976 section 57.2b |
| | This was addressed questioned with Gemma in 2016/17 and after taking advise emailed to confirm it was correct |
| | |
| 8.2 | (New) Operators must have DBS check done |
| | |
| 8.6 | (New rule) Operator must inform NNDC of drivers joining and leaving firm |
| | Uncertain of the need for NNDC to track who drivers are working for. |
| | complaints would target a driver directly or name the company whom he was driving for |
| | This just adds more work load to operators |
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| 8.7 | this is the same as 8.11 just more breif |
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| 8.11 | same as 8.7 just more detail |
| 8.13 | (change to rule) records must be kept for 3 years instead of 6 months Excessive increase, is there any justification ? |
| 8.15 | (New rule) PH operators must keep records of vehicles held |
| 8.19 | Refers to equalities act |
| 8.20 | PH operators need to supply proof of planning permission on application Difficult to prove that you dont. Planning arent that helpful, but there is a form from NNDC that outlines when you do which is where planning direct people. Cost involved for letter |
| 8.23 | Changed from notifying council to keeping records |
| 8.28 | (New rule) Must have enough parking spaces for all vehicles waiting for bookings and notify council upon application or when space numbers change |
| Pg 40 | Hackney carriage bylaws |
| 9.2 | |
| 2 | Vehicles must display in 38mm high letters the Words' For Hire' when available and must be visable from outside the vehicle. |
| 9.15 & 7.27 | Updated details on how to deal with a body |
| 9.16 | |
| 9.17 | Covers lost property and duplicates at 7.31 & 7.32 |
| pg 43 - 44 | Penalty points |
| 10 | Points offences increased by 14 offences (27 - 41) (PP16) does not allow for vehicles that have run flats, (PP27) could be made obsolete (PP32) needs to cover all of 7.41 not just smoking (PP36) should not include bulbs as they can blow at any time. |
| | Minor traffic offences |
| 11.1 | Increases from 0 suspensions 12 months to no more than 2 in 2 years Is this only relevant to new applictants or to renewals to |

