REPORT FOR DECISION



Agenda Item

DECISION OF:	LICENSING & SAFETY PANEL/COUNCIL		
DATE:	LICENSING AND SAFETY PANEL - 5 th MARCH 2020 COUNCIL - 18 TH MARCH 2020		
SUBJECT:	HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE TEST INSPECTION MANUAL		
REPORT FROM:	EXECUTI	/E DIRECTOR (OPERATIONS)	
CONTACT OFFICER:	MR M BRI	DGE	
TYPE OF DECISION:	COUNCIL		
FREEDOM OF INFORMATION/STATUS:	This paper is within the public domain		
SUMMARY:	This report relates to the testing of Hackney Carriage and Private Hire vehicles introducing a vehicle inspection manual that confirms the standard required to pass the vehicle test.		
OPTIONS & RECOMMENDED OPTION	 To implement the proposed vehicle inspection manual as proposed. To implement the vehicle inspection manual with amendments determined by members of the Licensing and Safety Panel. To refuse the proposed vehicle inspection manual and continue with the current testing regime. 		
IMPLICATIONS:			
Corporate Aims/Policy Framework:		Do the proposals accord with the Policy Framework? Yes No	
Statement by the S151 O Financial Implications an Considerations:		There are no specific issues from the report other than potential costs/risks associated with legal appeals including a Judicial Review	
Statement by Executive D of Resources:	Director The cost of the licensing function are funded through the fees and charges levied by the		

	Council. There may be additional costs to the service if appeals are lodged by licence holders with the Magistrates and Crown Courts.
Equality/Diversity implications:	Yes No (see paragraph below)
Considered by Monitoring Officer:	Under the legislation the Council is required to determine applications. The report is in accordance with the appropriate legislation. Members are advised that Licences are regarded as possessions within the terms of the Human Rights Act 1998. Under the Act everyone is entitled to the peaceful enjoyment of one's possessions and so actions interfering with those possessions must be lawful, reasonable and proportionate. It is lawful to impose reasonable conditions as a way of protecting the safety of the travelling public, so long as it is not out of proportion. It is a balancing act between the public interest and the individual's rights.
Wards Affected:	All
Scrutiny Interest:	Overview and Scrutiny Panel

TRACKING/PROCESS

DIRECTOR:

Chief Executive/ Strategic Leadership Team	Executive Member/Chair	Ward Members	Partners
Scrutiny Committee	Committee	Council	

1.0 INTRODUCTION

1.1 Members will recall this issue which was considered on the 17th October 2019. A copy of the report and the minute is attached at Appendix 1.Members resolved that the Licensing Service undertake a full consultation with the Hackney Carriage/Private Hire Trade regarding the proposed vehicle inspection manual with a further report to be presented at a later date.

2.0 ISSUES

- 2.1 The licensing service have carried out a three month consultation of the Vehicle Testing Manual between the 25th November 2019 and the 25th February 2020.
- 2.2 At the time of writing this report the licensing service have received 117 responses during the consultation period and are attached in a table at appendix 2. The consultation was published on the Council's website and was open for comment.
- 2.3 Members should be aware that only vehicle proprietors will be affected by the proposed vehicle inspection manual should they decide to implement it.
- 2.3 Members are requested to consider the report and the attached vehicle inspection manual and sample test sheet are attached at Appendix 3.

3.0 **CONCLUSIONS**

- 3.1 . The options are contained at page 1 of the report which are:-
 - To implement the proposed vehicle inspection manual as proposed.
 - To implement the vehicle inspection manual with amendments determined by members of the Licensing and Safety Panel.
 - To refuse the proposed vehicle inspection manual and continue with the current testing regime.

List of Background Papers:-

Minutes of trade Liaison Meeting Report and Minutes of the Licensing and Safety Panel – 17th October 2019

Contact Details:-

Mr M. Bridge Licensing Office 3 Knowsley Place Duke Street Bury BL9 OSW Telephone: 0161 253 5209 Email: <u>m.bridge@bury.gov.uk</u>

DECISION OF:	LICENSING & SAFETY PANEL	
DATE:	17 th OCTOBER 2019	
SUBJECT:	HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE TEST INSPECTION MANUAL	
REPORT FROM:	ASSISTAN SERVICES	T DIRECTOR (LEGAL AND DEMOCRATIC
CONTACT OFFICER:	MR M BRI	DGE
TYPE OF DECISION:	COUNCIL	
FREEDOM OF INFORMATION/STATUS:	This paper	is within the public domain
SUMMARY:	This report relates to the testing of Hackney Carriage and Private Hire vehicles introducing a vehicle inspection manual that confirms the standard required to pass the vehicle test.	
OPTIONS & RECOMMENDED OPTION	 To request that the Licensing Service undertake a full consultation with the Hackney Carriage/Private Hire Trade regarding the proposed vehicle inspection manual with a further report to be presented at a later date. To implement the vehicle inspection manual as proposed without conducting a consultation. To implement the vehicle inspection manual with amendments determined by members of the Licensing and Safety Panel. To refuse the proposed vehicle inspection manual and continue with the current testing regime. 	
IMPLICATIONS:		
Corporate Aims/Policy Framework:		Do the proposals accord with the Policy Framework? Yes No
Statement by the S151 O Financial Implications an Considerations:		There are no specific issues from the report other than potential costs/risks associated with legal appeals including a Judicial Review
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	Council. There may be additional costs to the service if appeals are lodged by licence holders with the Magistrates and Crown Courts.
Equality/Diversity implications:	Yes No (see paragraph below)
Considered by Monitoring Officer:	Under the legislation the Council is required to determine applications. The report is in accordance with the appropriate legislation. Members are advised that Licences are regarded as possessions within the terms of the Human Rights Act 1998. Under the Act everyone is entitled to the peaceful enjoyment of one's possessions and so actions interfering with those possessions must be lawful, reasonable and proportionate. It is lawful to impose reasonable conditions as a way of protecting the safety of the travelling public, so long as it is not out of proportion. It is a balancing act between the public interest and the individual's rights.
Wards Affected:	All
Scrutiny Interest:	Overview and Scrutiny Panel

TRACKING/PROCESS

DIRECTOR:

Chief Executive/ Strategic Leadership Team	Executive Member/Chair	Ward Members	Partners
Scrutiny Committee	Committee	Council	

1.0 INTRODUCTION

1.2 The licensing service have been working closely with The Greater Manchester, Mayor's office, the 9 other Greater Manchester Licensing Authorities and Transport for Greater Manchester (TfGM) in the development of Common Minimum Standards relating to the Hackney Carriage and Private Hire Trade. These proposals were running consecutively with the Clean Air Agenda proposals relating to the introduction of a clean air zone in Greater Manchester.

- 1.3 Following a decision taken by of all ten Greater Manchester Leaders, a position statement was issued by TfGM to inform the trade that the proposed common minimum standards consultation would not take place this autumn, as previously suggested however we will continue to engage with the trade on the development of both the Clean Air Plan and common minimum standards.
- 1.4 Transport for Greater Manchester have placed a bid to Central Government for a Taxi Fund of £28 Million pound to assist the trade to upgrade their vehicles to become compliant under the proposed Clean Air Zone.
- 1.5 Due to this ongoing piece of work the development of a testing manual detailing the MOT safety elements and additional quality checks of the Councils compliance check policy has been delayed in Bury.
- 1.6 The licensing service has continued to engage with the trade and continue to engage within Bury about these proposals having held a trade liaison meeting to discuss the proposals
- 1.7 The Council currently licences 61 hackney carriage vehicles and 933 private hire vehicles. These are inspected every six months at the Council's testing station facility at Bradley Fold. Should a vehicle fail two consecutive test with three or more MOT faults either at the renewal inspection or at the interim inspection the vehicle will then be subject to an additional test and therefore undertake 3 tests per year.
- 1.8 The licensing service have undertaken a review of the testing regime which has prompted the creation of the vehicle inspection manual which is attached at appendix 1.

2.0 BACKGROUND

- 2.1 The Local Government (Miscellaneous Provisions) Act 1976 permits a Council to test a private hire or hackney carriage vehicle on no more than three occasions per annum. Bury Council has chosen to test vehicles twice per annum unless the vehicle has failed two consecutive test with three or more MOT faults either at the renewal inspection or at the interim inspection. Bury Council takes public safety very seriously and testing twice yearly acknowledges the high mileage of these vehicles, which increases potential for mechanical faults.
- 2.2 The current vehicle test lasts approximately 60 minutes and is conducted to Driver and Vehicle Standard Agency [DVSA] standards. In addition to MOT items, the test includes inspections of additional items relating to Council policy, conditions and current licensing legislation.
- 2.3 The vehicle licence is issued for one year and will have an interim inspection six months into the licence. Should a vehicle licence be suspended following the inspection the suspension will not be lifted until the vehicle has passed the inspection. This ensures that any defects on the vehicle are satisfactorily repaired to the satisfaction of the Licensing Authority before the vehicle is allowed to carry passengers.

- 2.4 The cost of the test is currently £55.00 which is incorporated in the vehicle test fee. Vehicles failing inspection are required to return to the garage for a retest. Currently the re-test is free if the vehicle has less than three identified faults. If the vehicle has between four and nine identified faults then the cost of the retest is £25.00. Any vehicle failing with ten or more identified faults then the vehicle proprietor is required to pay the cost of a full test (£55.00). The faults must be rectified within 10 working days otherwise the proprietor is required to pay the cost of a full test but, as noted above, the vehicle cannot legally carry passengers until defects are repaired.
- 2.5 The licensing service expect that a vehicle is maintained throughout the duration of the licence and as such all vehicles should be presented for test in a satisfactory standard.
- 2.6 Members should be aware that a report was presented to Licensing and Safety Panel in May 2014 to consider the review of the then current policies relating to the licensing and testing of Hackney Carriages and Private Hire Vehicles. Members resolved as an incentive to encourage proactive maintenance and provide for additional testing requirements where vehicles fall below acceptable standards the following:-

In addition to the normal pass or fail situation, any vehicle, regardless of age, which fails any two consecutive periodic inspections with 3 or more MOT failure faults (as defined in the VOSA MOT Inspection Manual for Private Passenger & Light Commercial Vehicle Testing) will result in the vehicle having to undergo 2 interim tests per year. The policy is to be applied as follows: -

- a. If a vehicle fails a first grant or a licence renewal inspection with 3 or more defined MOT faults and subsequently fails its interim inspection with 3 or more MOT faults, when the vehicle licence is next renewed, the vehicle will be subject to 2 interim tests during the period of the 12 month licence. The vehicle owner will be required to pay the Licensing Service the requisite fee for the additional test before the licence is granted.
- b. If a vehicle fails an interim inspection with 3 or more MOT faults and subsequently fails the next renewal inspection with 3 or more MOT faults, the licence will be renewed subject to 2 interim tests during the period of the 12 month licence. The vehicle owner will be required to pay the Licensing Service the requisite fee for the additional test before the licence is granted.

The Licensing Service have reviewed the current situation relating to the number of vehicles that are now subject to three tests a year. There are currently 29 vehicles. The remainder of the fleet, with the exception of vehicles under two years old, are subject to two tests a year.

It is felt that the implementation of the vehicle inspection manual will give the proprietors of vehicles greater detailed information about the standards that are required to be met.

4.0 **CONSULTATION WITH THE TRADE**

- 4.1 The licensing service presented the manual to the attending trade representatives at the trade liaison meeting on the 19th September 2019. Representatives from the Hackney Carriage Trade and Private Hire, discussed the creation of the vehicle inspection manual. The Licensing Unit Manager outlined that the vehicle inspection manual will deal with some of the issues that the trade have raised in the past, in particular regarding the appearance of the vehicle and damage to the bodywork. Due to the size of the document, copies were not circulated.
- 4.2 Following the trade liaison meeting and discussion with the Head of Legal Services it was felt that the consideration to the implementing of the vehicle inspection manual should be placed before this panel for consideration. It is suggested that it is necessary to do a full consultation exercise with the trade on this proposal.

5.0 **CONCLUSIONS**

5.1 Members are requested to consider the report and the attached vehicle inspection manual attached at Appendix 1. The options are contained at page 1 of the report.

List of Background Papers:-

Minutes of trade Liaison Meetings Previous Minutes of the Licensing and Safety Panel

Contact Details:-

Mr M. Bridge Licensing Office 3 Knowsley Place Duke Street Bury BL9 OSW Telephone: 0161 253 5209 Email: m.bridge@bury.gov.uk

VEHICLE INSPECTION MANUAL

The Assistant Director Legal and Democratic Services submitted a report relating to the testing of Hackney Carriage and Private Hire vehicles introducing a vehicle inspection manual that confirms the standard required to pass the vehicle test. It was reported that the licensing service presented the manual to the attending trade representatives at the trade liaison meeting on the 19th September 2019.

During discussion of this item, a number of drivers in attendance stated that some of the standards within the manual were too strict and could result in drivers being lost to other authorities. The Chair, Councillor Rafiq, explained that the report was seeking agreement to go out to formal consultation. If approved, drivers within the trade will have the opportunity to comment in detail and make suggestions as appropriate.

It was agreed:

That the Licensing Service undertake a full consultation with the Hackney Carriage/Private Hire Trade regarding the proposed vehicle inspection manual with a further report to be presented at a later date.

Appendix 2

Number of Licence Holders as of 21 st February 2020		
Hackney Carriage Drivers	93	
Hackney Carriage vehicle	63	
Private Hire Operators	32	
Private Hire Drivers	1079	
Private Hire Vehicles	933	

Total Number of Responses 117		
Hackney Carriage Drivers	1	
Association		
Hackney Carriage Driver	5	
Hackney Carriage Proprietor	1	
Bury Private Hire Drivers	4	
Association		
Private Hire Operator	2	
Private Hire Driver	101	
Private Hire vehicle proprietor	1	
Bury Drivers Association	1	
Member of the public	1	

HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE TEST INSPECTION MANUAL

	Organisation making Response	Comments made
1.	The Hackney Drivers Association Ltd	Do you agree with the content of the proposed Vehicle Test Inspection Manual? No
		Tell us why you don't agree: we have found it go's over the top
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: it needs to be made less onerous in some parts and will not help the council and the trade to get were we t be, the councils needs to meet with us to go though the inspection manual.
2.	Private Hire Drivers Association	Thanks for your detailed mot proposal. Having look at the proposal, it seems like bury council licensing department key strengths don't quite overlap with what we really need for better interest for the taxi trade Thanks again for taking the time to put this carbon copy propose together but on the behalf of our members and trade partner's we are rejecting bury council's mot manual proposal
		PHDA encourage bury council licensing department to resolve all the outstanding issue we demand better services for our hard Money why our members are not being issued mot certificate. Phda raised this issues countless time but there is no real progress. Current tinting windows policy which underestimates the law of land we need resolve the outstandin issues first
		Private hire drivers association demands better safer healthier working environment for larges self- employed job sector in bury.
3.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual ? No

		Tell us why you don't agree: I want the DVSA
		MOT Standard
		Suggestion:We should fallow dvsa standard not mot tester preference.
4.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: DVSA STANDARD OF MOT IS RECOGNISED THROUGHOUT THE COUNTRY AND THATS WHAT WE WANT.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Stick with DVSA manuals when doing MOT on taxi or private hire cars.
5.	Bury Driver Association	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Need an independent MOT Station.
		Want dvsa standard.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Dvsa standard
6.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Too many non Vosa, non safety and just cosmetics reasons to fail vehicle.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: All suggestions are submitted through PHDA (Private Hire Driver Association)
7.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?:

		No
		Tell us why you don't agree: It's too strict, the car goes through some ware and tear as the years go by.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: It is too strict if everyone else drives a car which goes such strict testing then it would be fair but that isn't the case. I think it should be inline with government's MOT POLICY.
8.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: We want DVSA STANDERD
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
9.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Too many reasons to fail the car which have absolutely nothing to do with customer safety
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
10.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Some things are not considered in a normal mot from a local garage eg paintwork ' cosmetic issues ' sticker issue and just unnecessary issues that seem to made up as you go along to recover a retest fee
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: I think we should have independent mot station to take our test more efficent and cost effective to council and

		more in the council nurse as other council de
11.	Private Hire	more in the council purse as other council do Do you agree with the content of the
11.	Driver	proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want DVSA STANDERED
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
12.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Fee is high and mot test standard should be as vosa standard.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
13.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Mot s,d be mot not your law
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
14.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: MOT SHOULD DVSA STANDARD
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
15.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
16.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?:
	1	14

		No
		Tell us why you don't agree: I want mot as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
17.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot as dvsa started
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
18.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
19.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot as dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
20.	Hackney Carriage Proprietor	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: It is to much
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: It you be like standered MOT.
21.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?:

		No
		Tell us why you don't agree: It's a farce
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
22.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: Yes
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
23.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Needs to review about paint and bodywork. Fee IS too much
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Review on front plate removal for safety.
24.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as DVSA
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
25.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa standard so I totally reject your manual
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: mot s,d according to dvsa not your standard
26.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?:

		NL-
		No
		Tell us why you don't agree: I want not same as dvsa standard.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
27.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: We want according to dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
28.	Private Hire Vehicle Proprietor	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Too long and unfair.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: I would expect DVSA Standard MOT check.
29.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot as dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
30.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
31.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?:
		17

		No
		Tell us why you don't agree: Want mot standards same as dvsa standers
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
32.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as national standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
33.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot stander smiler to national dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: mot standers s,d be same dvsa you why bury council going above the dvsa
34.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: This mot manual got 721 reason,s to fail your taxi mot with in 45 minute's*
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
35.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: Yes
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Stop getting nitty gritty with little things , example , small

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		scratches , stickers not displayed, and other small matters that are car related , look at your neighbours Rochdale , have you seen the state of their cars ,??? They nearly 20 years old and still going and now they in bury nicking our work and your concerned about minor issues. Get your act together this ain't no circus.
36.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot according to Dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Bury council should permote national standard not personal standard thanks
37.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as national DVSA standard.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
38.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I would like Bury Council to follow the existing national DVSA standard which is highly approved off.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
39.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I Want the mot to be the same as national DVSA standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
40.	Private Hire	Do you agree with the content of the
		10

	Driver	proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: It should be normal MOT.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Like other council a standard MOT should be accepted.
41.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: We want DVSA national MOT standard because we already have two MOT in a year.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
42.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: It's like new car mot. It's very difficult for drivers if they have 3 or 4 year old car
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Council should accept normal mot and check boby works
43.	Hackney Carriage Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa STDs
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
44.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Because I want the same regulations as DVSA
		Do you have any suggestions for additions or

		amendments to the proposed Vehicle Test Inspection Manual?: No
45.	Private Hire Driver	Do you agree with the content of the proposedVehicle Test Inspection Manual?: NoTell us why you don't agree: H
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
46.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: It is a carbon copy of manchester city council . Bury is a small town . Drivers hardly make both ends meet . They cannot afford to accept such unacceptable and totally against drivers proposal
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
47.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: No good Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
48.	Private Hire Driver	Tell us your suggestions: Should not be implementedDo you agree with the content of the proposedVehicle Test Inspection Manual?: No
		Tell us why you don't agree: If the vehicle passes a standard MOT like other councils then the vehicle is 100% road worthy
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Vehicle should have a normal MOT test and if passes plates should be given also vehicle with factory fitted tinted glass should be approved cost me over £1500 just to have glass changed
49.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No

		Tell us why you don't agree: mot s,d be same as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: fallow dvsa
50.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as nitinoal standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: fallow dvsa standard
51.	Hackney Carriage Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: mot same as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: fallow dvsa
52.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: fallow dvsa
53.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I am disagree of this proposal! Simple ! We are in 2020. Bury borough still in 1980. Come on make it easy for yourself and us. Simple it do it online!
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
54.	Private hire	Do you agree with the content of the proposed

	Driver	Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Want DVSA STANDRED
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
55.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa standerd
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: follow dvsa font go above the national standard
56.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Don't agree with current manual
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
57.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: mot s,d be same as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
58.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: want dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: fallow dvsa
59.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No

		Tell us why you don't agree: I want DVsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
60.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: You just making life difficult for us working class people. Over 700 reason to fail its ridiculous. Vosa dont have that many
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Bin the manual please
61.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Its discremination between the other borough requirements.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: All the requirements for cosmatic issue should be same like vosa standard.
62.	Private Hire Operator	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: My company want mot standers same as national standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Fallow dvsa
63.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Current manual is not fit for purpose
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: DVSA standard of MoTs

		and provide mot certificates not a certificate of compliance.
64.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want dvsa stander
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
65.	Hackney Carriage Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: The manual i.have seen it read it i dissagree with
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: We dont a manual we need you to make life easy less stressful
66.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want independent dvsa standard mot.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
67.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Fallow dvsa standers
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: I want dvsa
68.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Not dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
69.	Private Hire Driver	Do you agree with the content of the proposed

		Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want dvsa standerd
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Fallow dvsa
70.	Hackney Carriage Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards mot
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Fallow dvsa
71.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want same as DVLA standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
72.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
73.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want my MOT same as DVSA
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
74.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I Want dvsa standard

		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
75.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Dvsa mot centre
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Dvsa standard centre
76.	Hackney Carriage Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want MOT standards as DVLA.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
77.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want same mot standard as dvsa
		Do you have any suggestions for additions or
		amendments to the proposed Vehicle Test Inspection Manual?: No
78.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Dvla standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
79.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I just want same standard as Dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Dvsa
80.	Private Hire	Do you agree with the content of the proposed

	Driver	Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
81.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want MOT same as National standard (DVSA)
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
82.	Private Hire	Do you agree with the content of the proposed
	Driver	Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa standard.
		Do you have any suggestions for additions or
		amendments to the proposed Vehicle Test
		Inspection Manual?: No
83.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want dvsa standard
		Do you have any suggestions for additions or
		amendments to the proposed Vehicle Test
		Inspection Manual?: Yes
		Tell us your suggestions: Vosa standards
84.	Private Hire	Do you agree with the content of the proposed
	Driver	Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: want dvsa standerd
		Do you have any suggestions for additions or
		amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: i want dvsa standerd
85.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want same mot as d
·		

		VSA
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
86.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Dvla standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
87.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want dvsa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
88.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want a same standard as dvsa.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
89.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
90.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Dvla standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
91.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want standard vosa

		mot
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
92.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: We need independent vosa mot station
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
93.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: We belive in vosa standard independent mot station not self imposed standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
94.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: MOT. Should be to DVSA standard .
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Same as above.
95.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Vosa standards
96.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want mot same as DVsa national standard

		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
97.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Need dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Dvsa standard
98.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
99.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Want dvsa standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
100.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: i want VOSA REQUIREMENT
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
101.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Vosa standards
102.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No

		Tell us why you don't agree: The vosa mot test should be accpeted.there should be not differnce between vosa and taxi mot test
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
103.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Not DVSA standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Make it DVSA standard
104.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want same standards as dvsa
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
105.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want same standard as DVSA
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: No
106.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: It's not DVSA standard
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Make it dvsa standard
107.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: Not DVSA standard
		Do you have any suggestions for additions or

		amendments to the proposed Vehicle Test Inspection Manual?: No
108.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Make it vosa standards
109.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		T-ll
110.	Private hire Operator	Tell us your suggestions: Make it bosa standardsI hope this email finds you well I am emailingregarding to the reopening of the Bradley fold TestingStation as a driver and operator owner worker closelywith bury Council for many years I'm at so excited forthe reopening of Bradley fold.
		I have had the pleasure of having my vehicles tested at the old Bradley fold testing station for the previous years I've had always had a pleasant and efficient service and have always received structural advice on my vehicle which I appreciate .
		Since I've been a very licensed driver for 6 years I have had no issues with Bradley fold MOT Testing Station my vehicle has always been going in and coming out past the reason is why because I make sure the vehicle is prepped and prepared for its test . We do not need another MOT station . What we need is drivers to get their vehicles properly maintained and prepared for the MOT testing.
		If you don't spend money on your vehicles and don't prepare them and bringing your vehicle into MOT station and it fails it's your problem nobody else's.
		My vehicle is in for its entry test in 2 weeks I am looking forwards to visit the new Bradley fold test station

111.	Member of the Public	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: As i understand taxis do not have an MOT provided to the DVSA standars. That is what you should be following and not some over thought pointless heavy worded manual.
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: You dont need a manual and adopt proper MOTs
112.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Vosa standards
113.	Private Hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Vosa standards
114.	Private hire Driver	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: I want vosa standards
		Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Vosa standards
115.	Bury Private Hire Drivers Association	In line with your consultation for a new MOT manual for public and private hire vehicles Phda has consulted extensively with its members and wider trade partners. After reading it through and fully understanding it the draft mot manual was unanimously rejected by PHDA members. PHDA on behalf of its members, therefore, cannot support the draft manual and would like to

[[Private Hire Drivers Association	reject. The manual has a number of issues with due to which it cannot be accepted. There are a number of checks and inspections included over and above the basic mot requirements under the law which are not acceptable. PHDA maintains its stance to create a positive working environment where our vehicles are fit and proper and safe and would continue to do so, however, would object to any further unnecessary regulations and conditions which are not required by the law. Any local regulations attached to any part of the trade in Bury need to be proportionate and economically viable and relevant to the working conditions in Bury. Imposing a copy and paste manual from Manchester City Council will be detrimental to the already struggling taxi trade in Bury. We are keen to continue to engage with the department to reach a common sense way forward on this and any other issues related to the trade. PHDA is happy to set up a meeting withe the relevant person in the licensing department and go through the manual point by point to specify the issues and why the members and wider trade partners have rejected it. PHDA demand licensing department to issue vosa standard mot certificate instant of certificate of compliance our member,s want to use online services The copy of this letter would be shared with relevant local councillors and the MP for Bury North Mr James Daly. Thanks for your detailed mot proposal. Having a look at the proposal, it seems like bury council licensing department key strengths don't quite overlap with what we really need for better interest for the taxi trade Thanks again for taking the time to put this carbon copy proposal together but on the behalf of our members and trade partner's we are rejecting bury council's mot manual proposal
		PHDA encourage bury council licensing department to resolve all the outstanding issues we demand better services for our hard Money why our members are not being issued mot certificate. Phda raised this issues countless time but there is no real progress. Current tinting windows policy which underestimates the law of land we need resolve the outstanding issues first
117. F	Private Hire	Private hire drivers association demands better safer healthier working environment for largest self employed job sector in bury How many members do you represent?: 647

A	ssociation	Do you agree with the content of the proposed Vehicle Test Inspection Manual?: No
		Tell us why you don't agree: In line with your consultation for a new MOT manual for public and private hire vehicles Phda has consulted extensively with its members and wider trade partners. After reading it through and fully understanding it the draft mot manual was unanimously rejected by PHDA members. PHDA on behalf of its members, therefore, cannot support the draft manual and would like to reject. The manual has a number of issues with due to which it cannot be accepted. There are a number of checks and inspections included over and above the basic mot requirements under the law which are not acceptable. PHDA maintains its stance to create a positive working environment where our vehicles are fit and proper and safe and would continue to do so, however, would object to any further unnecessary regulations and conditions which are not required by the law. Any local regulations attached to any part of the trade in Bury need to be proportionate and economically viable and relevant to the working conditions in Bury. Imposing a copy and paste manual from Manchester City Council will be detrimental to the already struggling taxi trade in Bury.
		We are keen to continue to engage with the department to reach a common sense way forward on this and any other issues related to the trade. PHDA is happy to set up a meeting withe the relevant person in the licensing department and go through the manual point by point to specify the issues and why the members and wider trade partners have rejected it. Do you have any suggestions for additions or amendments to the proposed Vehicle Test Inspection Manual?: Yes
		Tell us your suggestions: Phda recommend bury council s,d fallow dvsa national standard and issue mot certificate rather then certificate of compliance